<table>
<thead>
<tr>
<th>Name</th>
<th>Affiliation</th>
<th>Town</th>
<th>Regulating Agency</th>
<th>Regulation Subject Matter</th>
<th>Regulation Section Number</th>
<th>Comments</th>
<th>Submission Date Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jeff Yale</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Shelton</td>
<td>Sunday Hunting</td>
<td></td>
<td></td>
<td>Currently CT does not allow hunting on Sundays. This is an old law based on the old belief that Sunday should be a day of rest. Times and religious beliefs have changed and hunters should get the full weekend to hunt during the limited seasons we have. Most sportsmen work hard all week at full-time jobs and only have Saturday to get into the field. We are at the mercy of the weather on that one day. Some years a hunter could have consecutive Saturdays of bad weather and not be able to use the permit they have paid for. The weather on Sunday might have been great, but we are not allowed in the woods those days.</td>
<td>10/18/2013 10:51:37 AM</td>
</tr>
<tr>
<td>Matt</td>
<td>Firearms Permit Examiners, Board Of</td>
<td>Shelton</td>
<td>Gun Laws</td>
<td></td>
<td></td>
<td>The new gun laws are violating the second amendment. These new laws do nothing to protect the law abiding citizen, it does the complete opposite. Criminals will not follow these new laws because they are criminals, the only people who will follow these laws will be people like myself (a law abiding citizen). You are limiting my right to protect myself and my family while you governor Malloy have protection that I could not have..double standard. I like many citizens of this state are not part of the elite and should be able to protect myself the same way you do. I want YOU Gov Malloy to look and read the second amendment carefully. It says &quot;A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed.&quot; Well good going you infringed on my rights! Listen to the people of this state and reverse these laws!</td>
<td>10/18/2013 10:51:37 AM</td>
</tr>
<tr>
<td>Jerome Rosenfeld</td>
<td></td>
<td>Bridgeport</td>
<td>I don't know</td>
<td>Public Transportation</td>
<td></td>
<td>Improvements to Both Rail and Bus Transportation in Fairfield County, Connecticut and surrounding region.</td>
<td>10/18/2013 10:51:37 AM</td>
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<tr>
<td>Name</td>
<td>Location</td>
<td>Position</td>
<td>Issue</td>
<td>Comment</td>
<td>Date</td>
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<tr>
<td>Paul Passarelli</td>
<td>Norwalk</td>
<td>Libertarian</td>
<td>I don't know</td>
<td>Simply sort the entire list by cost and start striking out the most expensive items! Don't stop until the State budget can afford what is left without the Income Tax, the Sales Tax, the gas tax, excise taxes, etc. If that means that <em>all</em> the regulations are struck from the books, then you'll have an idea of where we should be. Less Government. More Freedom.</td>
<td>10/18/2013 10:51:37 AM</td>
<td></td>
<td></td>
</tr>
<tr>
<td>michael mclane</td>
<td>Gales Ferry</td>
<td>I don't know</td>
<td>Annual Fee for corporations</td>
<td>I am treasurer for a NON-PROFIT charitable corporation, incorporated in CT. Each year we have to spend funds intended to help our local community to &quot;renew&quot; our corporation identity. Give me a break - We'll let you know if we ever go out of business. We'll gladly make the computer reports we now make annually but STOP charging us money to keep up STATE records. We do all the work of annual updates!</td>
<td>10/18/2013 10:51:37 AM</td>
<td></td>
<td></td>
</tr>
<tr>
<td>T.L Schroeder</td>
<td>Motor Vehicles Department</td>
<td>front license plate</td>
<td>Connectct didn't used to require license plates on the front of cars, only on the back. Let's return to that system. Just one more law we don't need. Thanks.</td>
<td></td>
<td>10/18/2013 10:51:37 AM</td>
<td></td>
<td></td>
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<tr>
<td>Walter Harris</td>
<td>Hamden</td>
<td>I don't know</td>
<td>Strike this law</td>
<td>Here is the law I would strike down: When a utility pole or line is downed by a storm or accident, the utility company can only obtain reimbursement if it replaces with the same equipment. By law it cannot obtain reimbursement for a smart alternative, such as undergrounding a utility line. Strike this law so that public policy encourages smart, long-term solutions.</td>
<td>10/18/2013 10:51:37 AM</td>
<td></td>
<td></td>
</tr>
<tr>
<td>John Smith</td>
<td>Administrative Services, Dept Of</td>
<td>Employee files</td>
<td>Ability to keep electronic (PDF) records of employee files rather than paper copies.</td>
<td></td>
<td>10/18/2013 10:51:37 AM</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
I have a company that holds a wholesale permit to distribute wine and liquor to retailers and restaurants. Our laws require that each and every label be registered with the state at cost of $200. A Unimerc number is also required for this registration at an additional cost of $40. This $240 expense is a regressive tax effectively on smaller businesses in this activity. Large distributors that sell huge amounts of mass produced wines pay the same fees which for them is an inconsequential cost per case sold. Not so for a small business and/or the smaller wineries they tend to represent. Neighboring states have no such requirements and it is no wonder there is greater selection and better pricing in those states as a result. The irony is that under the guise of "Consumer Protection" choices are more limited and prices higher. Just how are we protecting consumers with these policies? These regulations should simply be abolished. The state does generate revenue however through these fees (regressive taxes in my opinion) and those could be replaced by simply increasing the gallonage based excise tax on volume sold. Personally I would be very happy with a 2 cent per gallon increase in excise tax provided the fees and laborious process was eliminated. I believe an increase that small would replace the revenue from fees. In this way the playing field would be leveled, and small businesses could compete with the bigger ones. I would likely HIRE MORE PEOPLE to work for the company in such a scenario as these fees add up to two salaries for a small business that sells a wide array of product in small volumes.
<table>
<thead>
<tr>
<th>Michael O’Reilly</th>
<th>Citizen</th>
<th>Westport</th>
<th>I don’t know</th>
<th>Emissions</th>
<th>Governor Malloy,</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Here is your opportunity to win over moderate Republicans. while still keeping your $20.00 tax for emissions.</td>
</tr>
<tr>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>With few exceptions, all Automobiles exceed the emission standards set in 1993. Yet the owners of older cars 2001-2004 are continually harrased by having to make unnecessary, costly repairs to meet emission standards the cars already meet.</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>I can tell you of at least three companies with Van fleet’s that have chosen not to expand their presence in CT. because of this intrusive law. It is becoming a final straw for me moving to Florida in three years when my last child goes to college.</td>
</tr>
<tr>
<td>Name</td>
<td>Organization</td>
<td>Location</td>
<td>Permit Type</td>
<td>CGR-2</td>
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<tr>
<td>Arthur J. Renner</td>
<td>CT Society of Certified Public Accountants</td>
<td>Rocky Hill</td>
<td>bazaar or raffle permit</td>
<td>CGR-2</td>
<td></td>
</tr>
</tbody>
</table>

Dear Sir:

The purpose of this letter is to provide comments regarding outdated state regulations as stated in your Executive Order of October 16, 2013. We sincerely appreciate the opportunity to do so.

We are the Connecticut Society of Certified Public Accountants, a nonprofit organization with about 6,000 members. We hold an annual golf tournament and raffle, the proceeds of which are used to provide scholarships to accounting students in post-secondary schools located in Connecticut. We are required to submit an “Application for a Permit to Conduct a Bazaar or Raffle” (CGR-2). The administrative commitment to prepare the permit is very burdensome. The process requires three (3) original signatures of members living in the town/city where the raffle is to be held, plus the original signature of an officer of the organization. The application is then delivered to the police department of the town/city where the raffle is to be held and then a background check is conducted of each individual who signed the permit. (There is no language on the raffle permit to indicate that a background check would be performed). Upon completion of the background check, the permit must be approved by the chief of police. Lastly, the permit is delivered to the Department of Consumer Protection, Department of Revenue Services for a final review and approval. This process may take up to one week or longer.

The majority of our raffle prizes are donated and we do not receive them or learn of their donation in advance of the tournament. To further complicate the application process, the top three major prizes must be listed on the sample raffle ticket and all prizes and their value must be documented on the permit application prior to its approval. The value of each donated raffle prize does not exceed $600. The total value of the prizes awarded ranges from $5,000 to $5,500, a deminimis amount.

We suggest that the existing application process is unnecessary, complicated and burdensome for small raffles such as ours and should be required only for organizations that hold bazaars and raffles which exceed a higher value threshold.
Again, thank you very much for the opportunity to comment.

Sincerely,
Arthur J. Renner CPA
Executive Director, CT Society of CPAs
<table>
<thead>
<tr>
<th>Name</th>
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<th>Department/Role</th>
<th>Issue Description</th>
<th>Date/Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Greg</td>
<td></td>
<td>Secretary Of The State, Office Of</td>
<td>I find the Business Entity Tax to be unfairly punitive for small businesses. I have avoided starting a business and registering as an LLC because I am unsure how long it would take me to recoup the $250. I understand it’s a pittance for a large company -- but it is the sole factor holding me back from starting a small marketing business. Would suggest folding it into a corporate tax, perhaps? Or finding a way to eliminate it.</td>
<td>10/21/2013 6:35:00 PM</td>
</tr>
<tr>
<td>Anne Gast</td>
<td>Brookfield</td>
<td>Administrative Services, Dept Of</td>
<td>The process for applying for state employment is unnecessarily complicated, frustrating and opaque. It is difficult to find appropriate exams, impossible to attend examinations for folks unavailable on Saturdays, and challenging to track your progress or ascertain if and when your paperwork has been received or processed. The exams (if they are truly needed at all) should be online with clear indicators of your standing. The physical exams should be used only if a demonstrable skill is needed (a unique computer program on a state computer, for example) -- or as an option for people without internet access. Thank you for undertaking this review process.</td>
<td>10/21/2013 6:40:27 PM</td>
</tr>
<tr>
<td>Kevin Deame</td>
<td>Ellington</td>
<td>Revenue Services, Dept Of</td>
<td>For federal taxes I am able to offset gambling losses at the CT casinos against any winnings. For the State of CT taxes I have to pay on the winnings, even though there are offsetting losses. For example, if I break even for a year I do not have to pay federal income tax on the gambling income (losses can be offset using itemization). But in that same year if I have $50,000 in winnings and the same in losses, I would have to declare the winnings for the purposes of CT taxes and pay income tax even though I may have even lost money at the casino. This is very unfair and certainly discourages me from going to any casino.</td>
<td>10/23/2013 11:13:09 AM</td>
</tr>
</tbody>
</table>
The regulations and process for getting licensed to drive a daycare student transportation vehicle as well as the yearly registration process for the vehicles is much too complicated and confusing. Most daycare centers do not understand which license/registration process is required for vehicles used to transport children to and from school from a daycare center. We are not transporting from private residences, only from a center which is usually within a five or ten minute drive of the school. Most importantly, we need clarification on the training process for van drivers. It should not cost $500 to have a daycare van driver trained to transport a child to school. This cost is not realistic for most daycare programs. Also, we need more training programs available to us.

Other unnecessary regulations for this process include the contents of the first aid box (in addition to the first aid box that the health department requires us to carry with us at all times). Some of the items are very difficult to find and are unnecessary and will never be used.

Also, there is apparently a newer regulation that prohibits displaying the program website on the vehicle. This requirement seems random and unnecessary. Most businesses display a website on their vehicles, and daycare vehicles are permitted to display the name and phone number of the program on the vehicle. Displaying the website does not seem to present any more of a safety issue.

Thank you, Janet Settle

10/23/2013
11:15:48 AM
Janet Settle  | Little House in the Country Child Care  | Ellington Motor Vehicles Department  | student transportation vehicles  | The regulations and process for getting licensed to drive a daycare student transportation vehicle as well as the yearly registration process for the vehicles is much too complicated and confusing. Most daycare centers do not understand which license/registration process is required for vehicles used to transport children to and from school from a daycare center. We are not transporting from private residences, only from a center which is usually within a five or ten minute drive of the school. Most importantly, we need clarification on the training process for van drivers. It should not cost $500 to have a daycare van driver trained to transport a child to school. This cost is not realistic for most daycare programs. Also, we need more training programs available to us. Other unnecessary regulations for this process include the contents of the first aid box (in addition to the first aid box that the health department requires us to carry with us at all times). Some of the items are very difficult to find and are unnecessary and will never be used. Also, there is apparently a newer regulation that prohibits displaying the program website on the vehicle. This requirement seems random and unnecessary. Most businesses display a website on their vehicles, and daycare vehicles are permitted to display the name and phone number of the program on the vehicle. Displaying the website does not seem to present any more of a safety issue.  
Thank you, Janet Settle  | 10/23/2013 11:15:55 AM

| Kevin | Public Health, Dept Of  | day care  | 19a-79-11(e)  | Group size is listed as 20 for school age children. Group size should be increased to 30. Many schools have class sizes of more than 20.  | 10/23/2013 12:54:20 PM

| Kevin | Public Health, Dept Of  | day care  | 19a-79-5a(a)(1)(B)  | The day care provider does not need to know the business address of the parent. Phone numbers are sufficient.  | 10/23/2013 12:57:05 PM

| Kevin | Public Health, Dept Of  | day care  | 19a-79-3a(c)(2)  | Why does the department need to know when I change fees. I understand parents deserve 30 days notice but I should not have to notify the state.  | 10/23/2013 1:01:11 PM
<table>
<thead>
<tr>
<th>Name</th>
<th>Title</th>
<th>Type</th>
<th>Issue</th>
<th>Comment</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jean Suffield</td>
<td>Transportation, Dept Of</td>
<td>Livery license</td>
<td></td>
<td>We are a small business trying to provide handicap transportation to seniors in Simsbury area. It took us 60 days to provide the 33 pieces of info to submit an application. Much of the info was really none of the states business like our business plan, where were we getting the start up money etc. Fingerprint approval took 4 months. Now we are told it will be 2 months until we have a required HEARING to make sure nobody objects to our business. We want to provide this service and jobs but the process places a burden on applicants. At this point it will be 7 months from start to finish to obtain a handicap livery license.</td>
</tr>
<tr>
<td>Kevin</td>
<td>Public Health, Dept Of day care</td>
<td>19a-79-4a(h)(C)</td>
<td></td>
<td>There is no regulations that require you to have a dental policy so this consultant in theory has to do nothing. This is an added cost since most centers have to pay a consultant. This regulation should be removed.</td>
</tr>
<tr>
<td>Kevin</td>
<td>Public Health, Dept Of day care</td>
<td>19a-79-4a(h)(C)</td>
<td></td>
<td>There is no regulations that require you to have a dental policy so this consultant in theory has to do nothing. This is an added cost since most centers have to pay a consultant. This regulation should be removed.</td>
</tr>
<tr>
<td>Kevin</td>
<td>Public Health, Dept Of day care</td>
<td>19a-79-7a(d)(11)(E)</td>
<td></td>
<td>Regulations require single use disposable towels in bathrooms and do not allow for the use of hand dryers. Centers that use hand dryers are also required to have disposable towels which is an added cost.</td>
</tr>
<tr>
<td>Kevin</td>
<td>Public Health, Dept Of day care</td>
<td>19a-79-7a(e)(10)</td>
<td></td>
<td>regulations require chemicals to be locked. Regulation should be changed to chemicals shall be inaccessible to children. If chemicals are kept up high in an unlocked cabinet centers would still not meet the regulation even though the children are still safe.</td>
</tr>
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<td>Name</td>
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<td>Comment</td>
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</tr>
<tr>
<td>Allan Pilver</td>
<td>South Windsor</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Motor vehicle emissions testing</td>
<td>The requirement to emissions test vehicles is of questionable value. There should be a review to determine how many vehicles fail these days, relative to the number tested, especially when they are much more efficient than in prior decades. I have not had a problem in as long as I can remember even with cars over 10 years old. I no longer see cars, and even pick up trucks, spewing pollutants out of the tail pipe. The emissions testing should be ended or justified. I expect it is a waste of time and money.</td>
</tr>
<tr>
<td>Jennifer Hamilton</td>
<td>I don't know</td>
<td>Adverse possession</td>
<td></td>
<td>This law is outdated. In this day in age people should not be able to take people's property. Land is now clearly defined and owned. The seven year of use is ridiculous and squatters should have no rights.</td>
</tr>
<tr>
<td>Kevin</td>
<td>Public Health, Dept Of</td>
<td>day care</td>
<td>19a-79-7a(c)(3)(A)</td>
<td>Testing water supplied by public water companies for lead every 2 years seems excessive.</td>
</tr>
<tr>
<td>Virginia Benedetto</td>
<td>Stratford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Ronald Troia</td>
<td>Shelton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013</td>
</tr>
<tr>
<td>Eric Fisk</td>
<td></td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>P Fomenko</td>
<td>Branford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Name</td>
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<td>Department</td>
<td>Issue</td>
<td>Proposed Changes</td>
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</tr>
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</table>
| Erik Glastonbury | Glastonbury | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:09:19 AM |
| Jonathan Perry BURLINGTON Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1c and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:11:11 AM |
| Robert Nilsen Danbury Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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</table>
| Alfred M. Tucci Jr    | Seymour          | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013    |
| Francis G Zwierlein III | Bridgeport      | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013    |
| Ralph Cook            | Simsbury         | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Action</th>
<th>Details</th>
<th>Date</th>
</tr>
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</table>
| Joseph G Pearlingi | Terryville | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 |
| Russell Hehn    | Seymour    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 |
| John R. Krupinski | Winsted    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Issue Description</th>
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<tbody>
<tr>
<td>David T Farris</td>
<td>Marlborough</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  Thank you</td>
<td>10/26/2013 9:17:53 AM</td>
</tr>
<tr>
<td>Frank D Scopino</td>
<td>Colchester</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 9:18:41 AM</td>
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<tr>
<td>Ralph Russo</td>
<td></td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Mr John Joseph Gotowala | Bristol        | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:18:50 AM |
| Richard Brousseau      | Brooklyn       | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:18:55 AM |
| Tom Murray            | Southington    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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</table>
| Barbara Davino      | Terryville | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests      | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:19:37 AM |
| Harlen Marks        | Essex   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests      | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:20:08 AM |
| John S. Ciprus      | Essex   | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forests      | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<table>
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</tr>
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</table>
| Raymond Mott     | Mansfield              | Energy and Environmental Protection, Dept Of | Right to carry | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Ray Giannotti    | east haddam            | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Robert Drew      | Killingworth, CT       | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c), 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Eric Schutz</td>
<td>New Milford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>10/26/2013</td>
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| Robert Hauta          | Norwich    | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests | 23-4-1(c) and 26-66-2                      | 10/26/2013    |
|                       |            |                                             |                                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 9:21:28 AM    |
| Vincent Chrzanowski   | Baltic     | Energy and Environmental Protection, Dept Of| Carrying Handguns in State Forests | 23-4-1(c) and 26-66-2                      | 10/26/2013    |
|                       |            |                                             |                                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Message</th>
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| Jim Boisvert          | Cheshire | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 |
| Vincent M             | Bridgeport | Agriculture, Dept Of | Guns in state parks and forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| William Daniels       | Branford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<th>Name</th>
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<th>Page Numbers</th>
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</thead>
</table>
| Tim Howard          | Canton                    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Leonard Benedetto   | Stratford                 | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Scott Wilson        | New London CT             | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests.  
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<th>Carrying Handguns in State Forests</th>
<th>Modifications</th>
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| Christopher Byrne | GOshen       | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Ray Clinton  | Clinton       | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Angel Vega   | Seymour       | Energy and Environmental Protection, Dept Of | 23-4-1 and 26-66-2                | The right to protect oneself anywhere in the state should not be taken away. I should be able to enjoy the beauty of our parks and have the ability to defend myself if the need arises. Having obtained the legal permit to carry a firearm means that I have proven to be a law abiding citizen. |
| Jeffrey Schwartz | East Lyme  | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<th>Regulations Reference</th>
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| Cathy                  | Clinton     | Energy and Environmental Protection, Dept Of         | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:25:01 AM |
| Jesse Pereira          | Shelton     | Energy and Environmental Protection, Dept Of         | Carrying handguns in state parks | 23-4-1(c) and 26-66-2  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:25:47 AM |
| Christopher A. Wilson  | Voluntown   | Energy and Environmental Protection, Dept Of         | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:26:06 AM |
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<td>Jesse Dinoia</td>
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<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state parks</td>
<td>23-4-1(c)</td>
<td>Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c)</td>
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<td></td>
<td></td>
<td>and 26-66-2</td>
<td>of the Connecticut Agencies Regulations</td>
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<td>Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers</td>
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<td>(including handguns using center-fire ammunition) for the purposes of self</td>
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<td>defense.</td>
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<td></td>
<td></td>
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<td>We the people have the right to defend ourselves anywhere in the state.</td>
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<td>These restrictions, if known by an attacker, makes us as vulnerable as in</td>
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<td></td>
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<td>a gun free zone without the nearby protection of law enforcement. Example:</td>
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<td></td>
<td></td>
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<td>the heavily wooded trails of Wadsworth Park in Middlefield.</td>
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</tbody>
</table>

<p>| Scott        | Norwalk    | Energy and Environmental Protection, Dept Of| Carrying handguns in state forests| 23-4-1(c)  | Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c)    |
|              |            |                                             |                                 | and 26-66-2| of the Connecticut Agencies Regulations                                     |
|              |            |                                             |                                 |            | Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers   |
|              |            |                                             |                                 |            | (including handguns using center-fire ammunition) for the purposes of self  |
|              |            |                                             |                                 |            | defense.                                                                    |
|              |            |                                             |                                 |            | 10/26/2013 9:27:10 AM                                                      |</p>
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| roger bolduc | Naugatuck      | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 |
| Jennifer     | Derby          | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 |
| Ryan Burdge  | East Haven     | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Joel Begeron | Groton           | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Dan          |                  | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:30:01 AM |
| Dan Schnaufer| West Haven       | Energy and Environmental Protection, Dept Of | Restoration of pistol carry          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Date/Time</th>
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<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry handguns in state forest &amp; park</td>
<td>10/26/2013 9:31:02 AM</td>
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<td>Michael A</td>
<td>East Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forests</td>
<td>10/26/2013 9:31:23 AM</td>
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| Kimberli Carpenter | Shelton    | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 | 9:31:24 AM |
| George Scobie   | Milford    | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Ken Baylor      | Danbury    | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>Steven Long</td>
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<td>Energy and Environmental Protection, Dept Of</td>
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<td>Kristen McNulty</td>
<td>Meriden</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1 (c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. We want to be able to protect ourselves against threatening wildlife!</td>
<td>10/26/2013 9:31:57 AM</td>
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<tr>
<td>Danielle Keeley Gayda</td>
<td>Shelton</td>
<td>Energy and Environmental Protection, Dept Of</td>
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| J. Christian grivalsky| Energy and Environmental Protection, Dept Of | Carrying handguns in state forests | 23-4-1 and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013          | 9:32:05 AM    |
| Jose Pansini          | Cromwell         | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013          | 9:32:08 AM    |
| Stanley Speer         | east haven       | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Kyle Houghton| Thompson     | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Mark Battista| North Haven  | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Thomas Brown | Vernon       | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Elizabeth Scobie            | Milford    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Russell Bertrand            | Thompson   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Allan A. Banyacsky          | Beacon Falls | Energy and Environmental Protection, Dept Of | Carrying handguns in State Parks | 23-4-1          | Please allow permit owners to carry pistols in our state parks and forests.                                                                                                                                        | 10/26/2013 9:33:39 AM |
| Andrew Derbyshire           | Ansonia    | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2        |                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Bozrah</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry handguns in State Forests 23-4-1(c) and 26-66-2</td>
<td>10/26/2013 9:35:06 AM</td>
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<td>Dave VanWie</td>
<td>Danbury</td>
<td>Emergency Services and Public Protection, Dept Of</td>
<td>Carry handguns in State Forests 23-4-1(c) and 26-66-2</td>
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<td>Jesse Wisner</td>
<td>Bristol</td>
<td>Energy and Environmental Protection, Dept Of</td>
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| Carl R Brown         | Griswold                      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| George               | Waterbury                     | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Waldemar Demusz | Bolton  | Energy and Environmental Protection, Dept Of     | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| David Cheesman | Wallingford  | Energy and Environmental Protection, Dept Of     | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Paul J Carmen | Torrington  | Energy and Environmental Protection, Dept Of     | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Barry         | Farmington        | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests       | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Tom Corbett   | Uncasville, CT    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Parks         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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Thank you for your time - Tom Corbett | 10/26/2013   |
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| Michael MacCracken  | Plainfield | Energy and Environmental Protection, Dept Of | Carrying handguns in state forest         | 23-4-1c 26-66-2     | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Max Rosenberg       | Stratford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
<p>| Robert Chambers     | Taxpayer  | Stratford                                   | Carrying handguns in state parks          | 23-4-1(c) and 26-66-2 | I think this prohibition should be removed as it serves no useful purpose. If poaching is an issue then the wardens can deal with that directly. There are coyotes, bear, various wild cats out in the woods and cell phone coverage is not always good. If a person is lawfully carrying a handgun on their person, they should be able to carry one in a state park as well.                                                            |</p>
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<td>Danny Brandt</td>
<td>Cromwell</td>
<td>Attorney General, Office Of The</td>
<td>Gun rights we are not all bad people</td>
<td>10/26/2013</td>
<td>9:44:07 AM</td>
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<td>Thomas Gallagher</td>
<td>North Branford</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Jim Reilly</td>
<td>Oxford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013</td>
<td>9:44:30 AM</td>
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| Cody Rawling       | Seymour      | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:44:31 AM |
| RONALD IACOBucci   | SOUTH WINDSOR| Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) and 26-66-2  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:44:48 AM |
| Samuel Harding     | Seymour      | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid CT Concealed carry permits, to carry their handguns for self defense, in our State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) and 26-66-2  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:44:50 AM |
<p>| Daniel L Miller    | East Lyme    | Energy and Environmental Protection, Dept Of | Please modify the State regulations to allow individuals with valid CT Concealed carry permits, to carry their handguns for self defense, in our State Parks and Forests. And, remove the prohibition of &quot;Carrying of Firearms&quot; in 23-4-1(c) and add an exemption to 26-66-2 to allow for the carrying of handguns (using center-fire ammunition) for self defense. | 10/26/2013 9:45:00 AM |</p>
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<th>Location</th>
<th>Department</th>
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<tr>
<td>Michael Hannan</td>
<td>Quaker Hill</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/26/2013</td>
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- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense | 9:45:14 AM    |
| Andrew Purchia      | Meriden            | Energy and Environmental Protection, Dept Of | Carrying handguns in State Parks                                      | 10/26/2013    |
|                     |                    |                                         | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense | 9:45:27 AM    |
| Shawna Zito-Hannan  | Quaker Hill        | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests                                  | 10/26/2013    |
|                     |                    |                                         | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense | 9:45:50 AM    |
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<td>Eric Vaughn</td>
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<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying firearms in state parks</td>
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<tr>
<td>Name</td>
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<tr>
<td>Robert Mattson</td>
<td>Newindton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry handguns in State Forests</td>
<td>10/26/2013</td>
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<td>23-4-1(c) &amp; 26-662</td>
<td>9:49:33 AM</td>
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|                 |                  |                                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |               |
| Michael Lowell  | Groton           | Energy and Environmental Protection, Dept Of | Carrying handguns in state parks         | 10/26/2013    |
|                 |                  |                                 | 23-4-1(c) and 26-66-2                    | 9:49:47 AM    |
|                 |                  |                                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| David Bochan    | East Hampton     | Energy and Environmental Protection, Dept Of | Handguns in State parks and forests      | 10/26/2013    |
|                 |                  |                                 | 23-4-1(c) and 26-66-2                    | 9:50:03 AM    |
|                 |                  |                                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |               |
<p>| Jeremy Rooks | Quaker Hill | Energy and Environmental Protection, Dept Of | carrying handgun in state forest | 23-4-1 (c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:51:07 AM |
| Daniel Forchielli | West Haven | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:51:22 AM |
| Harold Bacon | Plantsville | Emergency Services and Public Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:51:43 AM |</p>
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<tr>
<th>Name</th>
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<th>Department</th>
<th>Reason</th>
<th>Requested Changes</th>
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</thead>
</table>
| Leon Grossman | Ellington    | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests | Please modify the state agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in section 23-4-1(c) of the Connecticut Agencies Regulations.  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for self defense.  

Thank you  
Leon Grossman |

| Fedele Volpe  | Orange       | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| William Hayes | Old Saybrook | Energy and Environmental Protection, Dept Of | Carrying of Firearms | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Anthony Reccchia | Goshen          | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Arthur Gaignat  | Manchester      | Energy and Environmental Protection, Dept Of | Carring handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 |
| Wayne Manchester|                 | Energy and Environmental Protection, Dept Of | Carrying handguns in state parks an | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Action Description</th>
<th>Date</th>
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<tbody>
<tr>
<td>Craig Szwed</td>
<td>CT</td>
<td>Firearms Permit Examiners, Board Of Union</td>
<td>Current regs do not allow CT concealed carry permitees to carry for protection in state forests and parks. Since the state has already checked us out and licensed us to carry concealed it is logical that we should not have our constitutional rights infringed when on state property. All duly licensed permitees have the constitutional right to carry without restriction, for protection of self and protection of the state.</td>
<td>10/26/2013</td>
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</table>
| Andrew Martin| Willington          | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013    |
| Ryan Duksa   | Torrington          | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Carrying handguns in State Forests</td>
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<td>23-4-1 (c) &amp; 26-66-2</td>
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<tr>
<td>Leonard Kulicki, M.D.</td>
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<td>Energy and Environmental Protection, Dept Of</td>
<td>10/26/2013</td>
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<td>carrying handguns in state forests</td>
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<td>23-4-1(c), 26-66-2</td>
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<td>Federal law allows, legal, law abiding citizens who have passed background scrutiny and possess pistol carry permits to carry sidearms in federal parks and forests. Please remove the prohibition in section 23-4-1(c) and add an exemption to 26-66-2 to allow law abiding citizens who possess state issued permits to exercise their rights given to them by the state itself to carry sidearms on state land. Thank you, Len Kulicki, M.D.</td>
<td>9:55:21 AM</td>
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<td>Daniel D'Apice</td>
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<td>Energy and Environmental Protection, Dept Of</td>
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| Newell W Griswold | New England      | Energy and Environmental Protection, Dept Of  | Carrying handguns in State Forests                                   | lease modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| David             | Plainville       | Energy and Environmental Protection, Dept Of  | Carrying handguns in State Forests                                   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:56:46 AM |
<p>| Steven Greco      | East Hampton     | Energy and Environmental Protection, Dept Of  | Carrying handguns in state parks                                     | Please amend the laws to allow citizens with valid pistol permits to carry handguns, including those that use center fire ammunition, in state parks for the purpose of self defense. Thank you for your consideration regarding this matter. | 10/26/2013 9:57:58 AM |</p>
<table>
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<tr>
<th>Name</th>
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<th>Agency and Environment Protection, Dept Of</th>
<th>Carrying handguns in State Forests</th>
<th>Section Reference</th>
<th>Proposed Action</th>
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<tr>
<td>David F. Cyr Jr.</td>
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<td>Stephen J Savino</td>
<td>Burlington</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Chris Chiappa</td>
<td>Waterford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forests</td>
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| John Vincent          | Burlington    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests           | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Martin Emerson        | Branford      | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests           | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| John G. Krozer Jr.    |                | Energy and Environmental Protection, Dept Of | Carrying Handguns in state parks             | 23-4-1(c) & 26-66-2 | Dear Mr. Governor,  
Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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Thank You |
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| C Criswell   |                | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Mark F Wayne | Harwinton      | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Parks an | I am permitted to carry a gun in the state of Connecticut. Hiking the state parks and forests leave the hikers vulnerable to criminal activity since they are away from the public and park personnel. I have read of a number of serious crimes committed in these areas. Being able to legally carry on these properties will make for a safer public.  
Thank you.  
Mark F Wayne | 10/26/2013    |
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<tr>
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<th>Time</th>
<th>Member</th>
<th>Agency</th>
<th>Topic</th>
<th>Paragraph</th>
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| 10/26/2013      | 10:01:33 AM   | C Criswell              | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| 10/26/2013      | 10:01:49 AM   | William Starr           | Harwinton Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| 10/26/2013      | 10:02:46 AM   | Emily Starr             | Harwinton Emergency Services and Public Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Issue</th>
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| Jeffrey Phinney           | Emergency Services and Public Protection, Dept Of | Torrington   | Carrying handguns in State Forests                | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                 | 10/26/2013 10:03:32 AM |
| Richard Zank              | Energy and Environmental Protection, Dept Of |             | Carrying handguns in State Forests                | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                 | 10/26/2013 10:04:45 AM |
<p>| H. Richard Wisneski       | ACLU                                 | Enfield      | weapons/hand in state forest/parks                | You have more unlawful people carrying hand guns in all your city’s, untrained in safety, illegal weapon and you want to stop a person trained in firearm safety, with a pistol permit from carrying his or her firearm to protect them and family member from said gang bangers, who car jack, rape and kill unarmed people??!! I voted for you, what was I thinking, I know you had personal problems at home re firearms and it caused alot of pain, but please don't punish others who have done no wrong. If Doctor Pettit was armed his family would still be alive!!!!!! | 10/26/2013 10:05:50 AM |</p>
<table>
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<tr>
<th>Name</th>
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| Bruce August       | East Hartford | Energy and Environmental Protection, Dept Of | carrying hand guns in a state park                | 23-1-4(c) 26_66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| John Hermanson     | Milford    | Energy and Environmental Protection, Dept Of   | Carrying handguns in State Forests                | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Alf Liljeros       |            | Energy and Environmental Protection, Dept Of   | carrying handguns in state forests                | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
|Roger Teshera| Bristol Energy and Environmental Protection, Dept Of Carrying handguns in State Forests| 23-4-1(c) and 26-66-2| Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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|Jason Bell| East Hampton Energy and Environmental Protection, Dept Of Carrying handguns in State Forests| 23-4-1(c) and 26-66-2| Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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| Francis Miele | East Hartford   | Energy and Environmental Protection, Dept Of  | Carrying handguns in State Forests         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 |
| Lisa Napolitano | Columbia        | Energy and Environmental Protection, Dept Of  | Carry handguns, State Forests/Parks        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 |
| Jim Reck      | Old Saybrook    | Energy and Environmental Protection, Dept Of  | Carrying Handguns in State Forests         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Name</th>
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<th>Right to Carry Handguns in CT State Parks/Forests</th>
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<tr>
<td>Chris Lemos</td>
<td>Stratford</td>
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<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Victor Duphily</td>
<td>Clinton</td>
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<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>James H. Day</td>
<td>Lebanon</td>
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<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense</td>
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| Jerry Sullivan       | Winsted     | Energy and Environmental Protection, Dept Of | 23-4-1 (c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Roger Peterson       | New Britain | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| F. Peter Hall        | Bristol     | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Andre Asprelli | Hamden   | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Robert Jochim | Milford  | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Michael Cote | Coventry | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>Lloyd VanLanen</td>
<td>Voluntown</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2 To whom it may concern: Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Thank you, Lloyd VanLanen 456 Pendleton Hill Rd. Voluntown, CT 06834</td>
<td>10/26/2013 10:17:04 AM</td>
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<td>Jonathan Fowler</td>
<td>Torrington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State parks</td>
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<td>Durham</td>
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<td>Adrian Maung</td>
<td>Woodbridge</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Section(s)</td>
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| Arthur D. Mazeau      | Clinton                   | Emergency Services and Public Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Gerard A. LeBlanc     | Putnam                    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) & 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Frank Boutot          | Manchester                | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests | 23-4-1 (c) & 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Kevin Healey</td>
<td>Suffield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Handguns in State Parks</td>
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<td>Mark Daigle</td>
<td>West Hartford</td>
<td>Emergency Services and Public Protection, Dept Of</td>
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<tr>
<td>Travis Spalding</td>
<td>putnam</td>
<td>Firearms Permit Examiners, Board Of</td>
<td>carrying in state parks</td>
<td>I believe Connecticut citizens who obtain a carry permit legally by taking training courses and paying a large sums of money should be able to defend themselves in any place such as state parks.</td>
</tr>
<tr>
<td>Paul Gruber</td>
<td>Voluntown</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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| Harry Finley | Game Club Member, avid hunter and 2nd Amendment advocate. | Watertown | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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I am trained in gun safety and would like to be protected in all parts of the state, but particularly in CTR parks and forests. | 10/26/2013 10:23:51 AM |

| harold | new britain | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Department</th>
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| Edward Sutton      | Morris       | Energy and Environmental Protection, Dept Of    | Carrying Handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits To Carry Pistols and Revolvers to carry a handgun in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense.                                                                                      |
| David A Dojnia     | Ansonia      | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits To Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense.                                                                 |
| Paul A. Ramsey     | Norwich      | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permit to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Robert Wildermuth</td>
<td>Portland</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry of handguns in State Forests</td>
<td>10/26/2013</td>
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<td>Please remove the prohibition of 'carrying of firearms' in section 23-4-1 and 26-66-2</td>
<td>10:27:25 AM</td>
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<td>Add an exemption to 26-66-2 to allow the carrying of pistols or revolvers</td>
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</tr>
<tr>
<td>Luc Morin</td>
<td>New Britain</td>
<td>Governor's Office</td>
<td>Right to own and carry my guns</td>
<td>10/26/2013</td>
</tr>
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<td></td>
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<td></td>
<td>I should be able to own and carry my guns anywhere in this State and that include the state forest and can you also release all information on Sandy Hook shooting if there is nothing to hide otherwise we are getting hosed again by your administration</td>
<td>10:27:29 AM</td>
</tr>
<tr>
<td>Charles Falzone</td>
<td>Fairfield, CT</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/26/2013</td>
</tr>
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<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</td>
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<td>Donald Gordon</td>
<td>Montville</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
<td>10/26/2013</td>
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</tbody>
</table>
| Johan van Achterberg  | East Windsor  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Thank you for your consideration. Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Prohibition of firearms in state parks and forests is ineffective (leaving law-abiding citizens whom the state has vetted and authorized to carry firearms in public does not reduce crime or add to public safety) and unnecessarily burdensome (requires them to take pains to disarm and secure their firearms off of their person whenever they enter a state park or forest). Thank you. |
| Rebecca L Johnson     | Rockfall      | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<th>Agency and Protection, Dept Of</th>
<th>Activity</th>
<th>Section Numbers</th>
<th>Notes</th>
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</table>
| Kenneth Velez| Fairfield  | Energy and Environmental      | Carrying handguns in State Forests            | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Randy DaRos  | Coventry  | Energy and Environmental      | Carrying handguns in State Forests            | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Jason Hart   | Bristol   | Energy and Environmental      | Carrying handguns in State Forests            | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
  Thanks Jason Hart. |

10/26/2013 10:29:19 AM
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| DANIEL RIVERA     | MERIDEN                          | Energy and Environmental Protection, Dept Of     | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Michelle Velez    | Fairfield                        | Environmental Quality, Council On               | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| William           | Meriden                         | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Document</th>
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<tbody>
<tr>
<td>Shufeng ton</td>
<td>Oxford</td>
<td>I don't know pistol permit carry in state forest</td>
<td>Hiking in state forests and parks. We as law abiding citizens with a valid pistol permit should be allowed to carry our firearms. We have gone thru the required safety training courses to carry our firearm. Dangerous wildlife is present in CT. Denying our right to carry is denying our right to protect ourselves and our loved ones when hiking. Just imagine how you can react to a situation where your wife, kids and the elderly are unable to fight off these dangers and you will be limited in helping. Allowing lawful carry will help ensure their safety.</td>
</tr>
<tr>
<td>Brett Stroke</td>
<td>Naugatuck</td>
<td>Energy and Environmental Protection, Dept Of Carrying handguns in State Forests 23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Philip B Barbetta</td>
<td>Stratford</td>
<td>Emergency Services and Public Protection, Dept Of 23-41-1 (c). 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Blaine Morin | Southington | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 10:33:04 AM |
As a police officer in the State of Connecticut for over 33 years and still serving; the overwhelming evidence that lawful carry of handguns by a citizenry does deter crime. Therefore I am urging you to modify the Department of Energy and Environmental Protection’s Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

As a police officer, I am not exempted from these regulations in an off duty capacity.

Respectfully,
Robert D Soule Jr.

Home:
81 Burwell Road
New Hartford, CT 06057-4109
Phone: (860) 379-7903

Work:
Simsbury Police Department
933 Hopmeadow Street
Simsbury, CT 06070
Email: RSoule@pd.simsbury-ct.gov
Phone: (860) 658-3116
<table>
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| Lawrence Ganim     | Trumbull  | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Jeffrey Patton     | Meriden   | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Cheryl Lemos       | Stratford | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Derek Anforth| Sterling       | Energy and Environmental Protection, Dept Of | Handguns in State Forest/Parks  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 |
| Tony Cuomo    | Oxford         | Energy and Environmental Protection, Dept Of | Concealed weapons by permit holders | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 |
| Mike Patton   | Trumbull       | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Hunter Perkins   | Lebanon    | Energy and Environmental Protection, Dept Of    | 23-4-1(c) and 26-66-2               | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Rick O'Connor    | Waterbury  | Energy and Environmental Protection, Dept Of    | 23-4-1(c) and 26-66-2               | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013    |
| Michael Faucher  | Putnam     | Energy and Environmental Protection, Dept Of    | 23-4-1(c) and 26-66-2               | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Edward Josefow Jr</td>
<td>Colebrook</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify State Agencies Regulations to allow individuals with valid permits to carry a handgun for self defense while in Connecticut State Parks and Forests. Specifically: Remove the prohibition on the 'carrying of firearms' in section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense.</td>
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<td>Michael Aukstolis</td>
<td>Newington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<td>Wayne DeRoy</td>
<td>Avon</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State Forests/Parks</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations – Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| William Zehrung    | New Milford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  |
| William A. Forbes  | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forests | 23-4-1(c) and 26-66-2 | PLEASE MODIFY THE STATE AGENCIES REGULATIONS TO ALLOW INDIVIDUALS WITH VALID PERMITS TO CARRY PISTOLS AND REVOLVERS FOR SELF DEFENSE WHILE IN CT STATE PARKS AND FORESTS SPECIFICALLY;  
- REMOVE THE PROHIBITION ON THE 'CARRING OF FIREARMS' IN SECTION 23-4-1(C) OF THE CONNECTICUT AGENCIES REGULATIONS  
- ADD AN EXEMPTION TO 26-66-2 TO ALLOW THE CARRING OF PISTOLS AND REVOLVERS (INCLUDING HANDGUNS USING CENTERFIRE AMMUNITION) FOR THE PURPOSES OF SELF DEFENSE.  |
| David Hatlee       | Norwich | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Request: Carrying Firearms in State Forests</th>
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<tbody>
<tr>
<td>Mike Burn</td>
<td>Plymouth</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>I fully support the Right To Carry in State Forests and Parks in Connecticut</td>
<td>23-4-1(c) and 26-66-2</td>
<td>10/26/2013 10:43:42 AM</td>
</tr>
<tr>
<td>David Woodhouse</td>
<td>Milford</td>
<td>Emergency Services and Public Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Daniel Kapustic</td>
<td>East Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Michael Gallagher</td>
<td>Prospect</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</td>
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| Bobby Lee Farris | Woodbury CT | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Robert Staffard | Stafford | Energy and Environmental Protection, Dept Of | Handguns in state forests/parks | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Ken Johnson   | Stratford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 10:45:27 AM |
| Philip Churchill    | Uncasville        | I don't know                                                             | Concealed carry in state forests With the amount of killers, rapists and thieves in this state, me or my wife can't carry or weapons legally when walking our dogs in a state forest. A place where I can hunt but can't carry a pistol for protection. This needs to change | 10/26/2013 10:46:07 AM |
| Matthew Gioia       | Rocky Hill        | Energy and Environmental Protection, Dept Of                             | Carrying handguns in State Forests 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Joe Rainis          | Fairfield         | Taxpayer in the State of Ct. County of Fairfield                        | Energy and Environmental Protection, Dept Of carrying hand guns in forests/parks 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>Ronald Ingraham Jr</td>
<td>Windsor</td>
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<td>Norwalk</td>
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<td>Tolland</td>
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<td>Emergency Services and Public Protection, Dept Of</td>
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| Daniel Trudel  | Bristol  | Energy and Environmental Protection, Dept Of Energy | 23-4-1(c) and 26-66-2 | Modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Gregory Bembry| Windsor  | Energy and Environmental Protection, Dept Of Energy | 23-4-1(c) and 26-66-2 | Modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Kenia Torres   | New Haven| Energy and Environmental Protection, Dept Of Energy | 23-4-1(c) and 26-66-2 | Modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>RobertChristopher</td>
<td>CLINTON</td>
<td>Energy and Environmental Protection, Dept Of</td>
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| Brian J Binette       | Unionville   | Energy and Environmental Protection, Dept Of | Carrying Hand Guns in State forests        | 23-4-1c and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid permits to carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests Specifically:  
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<p>| James A. Niedzialkoski| Thompson    | Energy and Environmental Protection, Dept Of | Carry of firearms in state parks           | 23-4-1 (c) 26-66-2 | Allow the carry of firearms (pistols and revolvers) for personal self protection in state parks and land                                                                                                   |</p>
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<td>Jeffrey Kamen</td>
<td>Westbrook</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<tr>
<td>Peter Simard</td>
<td>Rocky Hill</td>
<td>Energy and Environmental Protection, Dept Of</td>
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I hike in State Parks. I love the Blue Trail System.

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| Michael A. Osga | Moosup | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forest & | 23-4-1(C) & 26-66-2 | We Should Be Able To Protect Are SELFS On State Property | 10/26/2013 11:02:21 AM |
| Henry Goerke | Ledyard | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Kenneth Boyd | Ledyard | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Farmington</td>
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<td>Frank McDonough</td>
<td>Plainville</td>
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<td>Trumbull</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying of firearm for personal protection: Have you given any thoughts when you disarm law-abiding citizens knowing that criminals totally reject laws?? The four area's with the toughest guns laws in the country are responsible for the highest rates of gun death's!! Wake up! Walter Megura</td>
<td></td>
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<tr>
<td>Mark Wilson</td>
<td>East Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>23-4-1(c) and 26-66-2</td>
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| Jeff             | Newington         | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| RAYMOND ROSSIGNOL| NEW BRITAIN       | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Nathaniel Neville| Wallingford       | Energy and Environmental Protection, Dept Of | Carrying handguns in state parks     | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Dom Basile</td>
<td>Oakville</td>
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<td>John Orazietti</td>
<td>Wolcott</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Parks &amp; Forests</td>
<td>23-4-1(c) &amp; 26-66-2</td>
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| Jason           | east lyme | Energy and Environmental Protection, Dept Of | carrying handguns in state forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| George Bernklau | meriden   | Energy and Environmental Protection, Dept Of | hunting with revolver and muzzleloa | I would like to legalize revolver hunting on state land and also allow a short muzzleloader season prior to shotgun season. |
| Shaun Chapdelaine | Bristol | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

I feel strongly about this proposal because I hike and run the trails in my nearby State Forest alone, a few times a week. I have my pistol permit and can legally carry my pistol, except to protect myself while enjoying the outdoors in our State Forests. Granted I usually have my fearless canine companion with me, it would still be reassuring to have my own personal protection on hand if needed. I am not as fearful of wildlife encounters as I am of human ones. I do carry an i.d. on me, God forbid, in the event something should happen to me I can be identified and I always tell someone my intended route. Women especially can not be too careful when it comes to protecting themselves. There was a time when I stopped hiking the trails because I was fearful of going out there alone. I have overcome that fear and decided I can't be held prisoner in a gym, when the outdoors is where I am really happiest. I think a lot of people, especially women, would rather carry a pistol for personal protection while in the State Forest alone and get in trouble for using if needed, than to not have anything and be raped or dead. There are already hunting laws in place, to prohibit people from using pistols for wildlife, so why I ask you, is it not logical to change this law, for our personal protection. Especially with budget cuts in the DEEP department and fewer officers, these area's are not exhibiting a strong or constant presence of DEEP officers.

I strongly encourage you to consider this change in our current law. Thank you very much for you time.
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| Steven Loban | Naugatuck     | Energy and Environmental Protection, Dept Of    | handguns, carry state forest parks                                    | 23-4-1c and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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   - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 |
| Joe Wonoski  | Guilford      | I don't know                                    | sidearm carry in state forests                                       | I feel that I should be able to carry a concealed sidearm as a pistol permit holder in state parks and forests. There are poisonous reptiles and rabies is spreading among mammals. Why can’t I legally protect myself as a responsible and trained permit holder? | 10/26/2013 |
| Thomas Bavone| Oxford        | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests                                   | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>JESSE YEAGER</td>
<td>CCDL MEMBER</td>
<td>CANTERBURY</td>
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<td>Roger Chung</td>
<td>West Hartford</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Thomas Bavone</td>
<td>Oxford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Archery Hunting on Sundays</td>
<td>Please allow the use of archery equipment for hunting on Sundays during applicable hunting seasons.</td>
<td>10/26/2013</td>
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| Adrian Mishtal      | Suffield | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Philip Kirsopp      | Lebanon  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Kyle Wengenroth     | Meriden  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>gilman chasse</td>
<td>Bristol</td>
<td>Governor's Office</td>
<td>Right to carry</td>
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<tr>
<td>James Davis</td>
<td>Middletown</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forest</td>
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<td>Roy Meyer</td>
<td>Enfield</td>
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<tr>
<td>Alan Shaw</td>
<td>Stamford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State Forests &amp; Parks 23-4-1(c) and 26-66-2 In Connecticut pistol permit holders go through training, background checks and pay a lot of money to obtain these permits. Please modify the State Agencies Regulations by adding an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Please also allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations</td>
<td>10/26/2013 11:28:46 AM</td>
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<tr>
<td>Brian Iacuone</td>
<td>Shelton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c), 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 11:29:19 AM</td>
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<td>Joe Wonoski</td>
<td>I don't know</td>
<td>sales tax</td>
<td>when you passed the 6.35% sales tax you broke a solemn promise made years ago by legislators that if the state income tax were passed (which it did) that the sales tax would never change. well, that promise was broken by you. how can conn. citizens trust their elected officials when these promises are broken?</td>
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| ross marble   | Mansfield         | Energy and Environmental     | Carrying handguns in State forest          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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|               |                   | Protection, Dept Of          |                                            |                                                                                                                                                                                                                                                                                                                                        | 11:29:31 AM|
| joe wonoski   |                   | I don't know                  | sales tax                                  | when you passed the 6.35% sales tax you broke a solemn promise made years ago by legislators that if the state income tax were passed (which it did) that the sales tax would never change. well, that promise was broken by you. how can conn. citizens trust their elected officials when these promises are broken?                                                                                       | 10/26/2013|
|               |                   |                               |                                            |                                                                                                                                                                                                                                                                                                                                        | 11:29:31 AM|
| Ray LaChance  | Greenwich         | Energy and Environmental     | Carrying handguns in State Forests         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<p>|               |                   | Protection, Dept Of          |                                            |                                                                                                                                                                                                                                                                                                                                        | 11:30:20 AM|</p>
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| Harlan M. Madnick  | Stamford | Energy and Environmental Protection, Dept Of          | Carrying handguns in State Forests             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Tony Szpara        | East Haven| Energy and Environmental Protection, Dept Of         | Carrying handguns in State Forests             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013   |
| levy               | east hartford | I don't know                                   | Carry pistol in state parks and woo            | I would like to be able to carry my firearm in state forest and parks                                                                                                                                 | 10/26/2013   |
| David              | South Windsor | Energy and Environmental Protection, Dept Of       | Carrying handguns in State Forests             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| David Logan   | Glastonbury       | Energy and Environmental Protection, Dept Of  | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                                                                                 |
| Michael Mencel| Stratford          | Energy and Environmental Protection, Dept Of  | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Jerry Debrosky| Stratford          | Energy and Environmental Protection, Dept Of  | handguns in state forests/parks | Please modify the state agencies regulation to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in ct state parks and forests. Specifically: remove the prohibition on the carrying of firearms' in section 23-4-1(c) of the Connecticut Agencies Regulations  
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<th>Proposal</th>
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<td>John Romano</td>
<td>Rocky Hill</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Handguns in State Forrests</td>
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<td>Jack Kavanaugh</td>
<td>Groton</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>William Suraci</td>
<td>Seymour</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Kyle Richards</td>
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<td>Energy and Environmental Protection, Dept Of</td>
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<td>Cheshire</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Colchester</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Ledyard</td>
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<td>Jerri MacMillian</td>
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<td>Nick Bolovinos</td>
<td>Seymour</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Thank you</td>
<td>10/26/2013</td>
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<tr>
<td>Name</td>
<td>Location</td>
<td>Department</td>
<td>Concern</td>
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</tbody>
</table>
| Seth Smith   |          | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 11:43:51 AM |
| Richard      | Ridgefield | Energy and Environmental Protection, Dept Of | Carrying Handguns State Forest/Park | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 11:44:08 AM |
| Jeremy Hanson| Southington | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 11:45:12 AM |
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<tr>
<td>David Phaneuf</td>
<td>Waterford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/26/2013</td>
</tr>
<tr>
<td>Joe Scatchell</td>
<td>Avon</td>
<td>Firearms Permit Examiners, Board Of</td>
<td>ability to carry firearms in state</td>
<td>10/26/2013</td>
</tr>
<tr>
<td>Bill Moshka</td>
<td>Bristol</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State forests/parks</td>
<td>10/26/2013</td>
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Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

Dear Governor;
While you may want to dismiss the 2nd amendment for your own political gains, the fact is carrying a firearm is legal and should remain so. This is just as important in state parks and forests as it is on the downtown streets of Hartford on a weekend night. Numerous assaults have taken place in our parks and forests. In addition, large predatory animals reside in our fair state. To deny people the ability to protect themselves is to ask for trouble. The fewer the gun free zones, facts prove the safer we citizens remain. Do not impose any more firearms restrictions.

Joe Scatchell
licensed but do not own a gun
<table>
<thead>
<tr>
<th>Name</th>
<th>Email Address</th>
<th>Location</th>
<th>Department</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Matthew W</td>
<td><a href="mailto:mwnorfolk@energy.state.ct.us">mwnorfolk@energy.state.ct.us</a></td>
<td>Norfolk</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. From a law abiding citizen Matthew W. Adamson Thank you for yor time.</td>
<td>10/26/2013 11:46:59 AM</td>
</tr>
<tr>
<td>Thomas R Violante</td>
<td><a href="mailto:trviolante@cdl.org">trviolante@cdl.org</a></td>
<td>New Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. After all, it's our CONSTITUTIONAL right in the CONSTITUTION STATE to bear arms in defense of my self and the state!</td>
<td>10/26/2013 11:47:14 AM</td>
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<tr>
<td>Name</td>
<td>City</td>
<td>State</td>
<td>Role</td>
<td>Section(s)</td>
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</tbody>
</table>
| Luke G. Gardner | Stamford           | Connecticut         | Citizen, Stamford Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests 23-4-1(c) and 26-66-2 | Please modify the State Agencies’ Regulations to allow individuals with valid CT Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Edward Grenier  | Voluntown          | Connecticut         | Citizen, Voluntown Energy and Environmental Protection, Dept Of | Carrying of handguns 23-4-1       | Please remove from regulation prohibition on carrying handguns in state forests and parks. |
| Harry Finley    | Watertown          | Connecticut         | Game Club Member, avid hunter and 2nd Amendment advocate, Watertown Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
I am trained in gun safety and would like to be protected in all parts of the state, but particularly in CTR parks and forests. |
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<tr>
<th>Name</th>
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<th>Date/Time</th>
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| Donald       |             | Energy and Environmental Protection, Dept Of    | Carrying handguns      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                                                                                                                                                                                                                                                                                 | 10/26/2013 11:49:31 AM |
| Cavanaugh    |             |                                                 | in State Forests       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                   |
| Andrew coy   | Oxford      | Energy and Environmental Protection, Dept Of    | Carrying handguns      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                                                                                                                                                                                                                                                                                 | 10/26/2013 11:50:26 AM |
|              |             |                                                 | in state parks         |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                   |
| Michael      |             | Energy and Environmental Protection, Dept Of    | Carrying handguns      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                                                                                                                                                                                                                                                                                 | 10/26/2013 11:51:59 AM |
<p>| McHugh       |             |                                                 | in State Forests       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |                   |</p>
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<tr>
<td>Wallis M. Duarte</td>
<td>South Windsor</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/26/2013</td>
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<tr>
<td>Edward M. Singleton</td>
<td></td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.
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<tbody>
<tr>
<td>Edward Grenier</td>
<td>Voluntown</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carrying handguns</td>
<td>26-66-2</td>
<td>please modify regulation to allow for the carrying of pistols and revolvers including centerfire ammunition.</td>
<td>10/26/2013 11:53:51 AM</td>
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</table>
| Thomas Putnam      | Putnam     | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 11:54:01 AM |
| Carol Aldrich      | Goshen     | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>Ryan</td>
<td>Norwich</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/26/2013 11:56:40 AM</td>
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<td>23-4-1(c) and 26-66-2</td>
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<td>- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Steve Puzycki</td>
<td>Colchester, CT</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in state forests</td>
<td>10/26/2013 11:56:47 AM</td>
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<td>23-4-1c and 26-66-2</td>
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<td>Please adjust the regulations to allow persons with permits to carry pistols and handguns in state forests.</td>
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<td>Name</td>
<td>Location</td>
<td>Agency</td>
<td>Carrying handguns in State Forests</td>
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| Timothy Benoit | Bristol       | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013     | 11:59:11 AM     |
| Laura Nunno   | Higganum      | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests | 23-4-1 (c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols + Revolvers to carry a handgun for self defense while in CT State Parks and Forests: specifically, remove the prohibition, the carrying of firearms in Sect 23-4-1(c) of Ct Agencies Regulations. Add in exemption 26-66-2 to allow carrying of pistols and revolvers (including handguns and using center-fire ammunition) for the purpose of self defense. | 10/26/2013     | 12:00:00 PM     |
| Tom           | Wallingford   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Proposed Action</th>
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| Michael Critser      | Trumbull     | Energy and Environmental Protection, Dept Of    | Carry handgun in State Forest/parks 23-4-1(c) and 26-66-2             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Jacob Vazquez Jr.    | Oakville     | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests 23-4-1(c) and 26-66-2              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Ron Napoli           | Ridgefield   | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests 23-4-1(c) and 26-66-2              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Glen Fongemie</td>
<td>New Britain</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2 - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Steve</td>
<td>Milford</td>
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<td>Roger Harwood</td>
<td>Manchester</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry handguns to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. You still haven’t figured out the bad guys don’t care about gun laws and this gives them another safe zone to rape and rob people.</td>
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<td>Name</td>
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| Gary Anderson       | Wallingford       | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 12:03:48 PM |
| Jim zaiko           | Naugatuck         |                                     |                                 | We as legal citizens should be able to carry weapons on state and a moped federal forests                                                                                                              | 10/26/2013 12:04:47 PM |
| Jim zaiko           | Naugatuck         |                                     |                                 | We as legal citizens should be able to carry weapons on state and federal federal forests.                                                                                                           | 10/26/2013 12:05:38 PM |
| Lazarus Alperovich  | Fairfield         | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 12:05:58 PM |
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| John Koenig       | Marlborough | Energy and Environmental Protection, Dept Of     | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013  
12:07:05 PM     |
| Craig Donacki     | Stonington  | Energy and Environmental Protection, Dept Of     | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013  
12:08:49 PM     |
| Jose Nieves       | New Britain | Energy and Environmental Protection, Dept Of     | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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12:09:24 PM     |
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</table>
| Brian Green       | Lebanon    | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Governor Malloy,  
Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
and  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Thanks very much.  
Brian Green |
| James D. Iannone  | West Hartford | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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10/26/2013 12:09:57 PM
10/26/2013 12:10:11 PM
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<tbody>
<tr>
<td>Ryan Nobrega</td>
<td>West Hartford</td>
<td>Emergency Services and Public Protection, Dept Of</td>
<td>Carry handguns in State Forests/Parks 23-4-1(c) and 26-66-2. Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Ryan Nobrega</td>
<td>West Hartford</td>
<td>Emergency Services and Public Protection, Dept Of</td>
<td>Hunting on Sunday. Please pass a law to allow for hunting on Sunday's during the states regular hunting seasons.</td>
<td>10/26/2013 12:11:03 PM</td>
</tr>
<tr>
<td>Christopher Dyer</td>
<td>Ashford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry handguns in State Forests 23-4-1(c) and 26-66-2. Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Joseph Locke</td>
<td>Milford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry handguns in State Forests 23-4-1(c) and 26-66-2. Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Cindy DeAngelis    | Marlborough         | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013    | 12:13:43 PM |
| Jeff Daricek       |                     | Energy and Environmental Protection, Dept Of | We should be allowed to carry a firearm with in the state parks for personal protection. I for one hike all over the state forests and bring my camera which is worth alot of money. I would feel safer when i am alone in the middle of the woods with my pistol to protect me from all things wild. On top of that with all the local reports and all the sounds the packs of coyotes have been making lately i am less likely to hike in the woods with no protection now. | 10/26/2013    | 12:13:58 PM |
| Matthew            | Woodbury            | Emergency Services and Public Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
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</table>
| Nick                | Meriden       | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| John B. Sterry, Jr. | Portland      | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Carrying handguns 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                 | 10/26/2013 12:16:09 PM |
| Steven ZA Bruno     | Governor's Office | carry in parks and STATE FORESTS | Should be legal | Should be legal                                                                                                                                                                                                                                                                                                                                                                           | 10/26/2013 12:16:15 PM |
| Richard Zlotnick    | Granby        | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests/Pa | Carrying handguns 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Raffaele LaPietra  | Greenwich  | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Michael Prince     | Middletown | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 |
| David Butler       | North Haven| Energy and Environmental Protection, Dept Of| Carrying handguns in state forests 23-4-1 and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Section</th>
<th>Item</th>
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<td>Kristopher Kauffman</td>
<td>Enfield</td>
<td>Carrying handguns in State Forests</td>
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<td>Peter Levanti</td>
<td>East Lyme</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<tr>
<td>Lyle Sendlein</td>
<td>Marlborough</td>
<td>Emergency Services and Public Protection, Dept Of</td>
<td>Carry of handguns on state lands I would like to respectfully request that the prohibition on carrying handguns for personal protection in state parks and forest be repealed. CT has an excellent permitting process for handguns that requires significant training in the laws and safe use of handguns. Pistol permit holders are subjected to state and federal background checks. They also, in many cases, are interviewed and approved by their local police chiefs. These are the people who represent the least threat to public safety and are the most likely to obey the regulations prohibiting carry on state lands. The criminals that we need to protect ourselves from, on the other hand, won’t obey the rules (which is what makes them criminals). This makes this just another example of nonsensical &quot;gun free zones&quot; that benefit none but the criminals. Please repeal this well intentioned, but absolutely pointless and harmful policy. Thank you, Scott Sendlein</td>
<td>10/26/2013 12:26:04 PM</td>
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<tr>
<td>Colin</td>
<td>Bristol</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Colin</td>
<td>Bristol</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Sunday Hunting The regulation prohibiting hunting on Sunday is outdated and services no purpose. It is extremely hard for hardworking 9-5 citizens to find the time to hunt, especially when you cut out one day the majority of the public has free. Please make this right.</td>
<td>10/26/2013 12:33:15 PM</td>
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<td>Energy and Environmental Protection, Dept Of</td>
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<tr>
<td>Jeffrey Sanborn</td>
<td>East Haddam</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>handguns in state forests &amp; parks 23-4-1(c) &amp; 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Roger Bohan</td>
<td>Harwinton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>State parks Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Mike Sharrio</td>
<td>Oakdale</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Chris Demisch</td>
<td>Stamford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Legal Concealed Carry in State Park</td>
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<td>12:46:05 PM</td>
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<tr>
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| Sean Kaplan        | Wolcott  | Energy and Environmental Protection, Dept Of   | Carrying handguns in state forests | 23-4-1c and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Shawn Strauss      | Southington | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Luciano B. Cabral  | naugatuck| Energy and Environmental Protection, Dept Of   | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>James L. Russell</td>
<td>Middletown</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Respectfully I ask that The State Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Jon Quint</td>
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| Mark C Poulin Jr         | Prospect      | Energy and Environmental Protection, Dept Of    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Stephanie Rice           |               | Energy and Environmental Protection, Dept Of    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Joe Busher | East Haddam | Environmental Quality, Council On Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |

| Robert & Toni Flanagan | Energy and Environmental Protection, Dept Of | Conceal carry in state parks |  | We go through a lot to obtain our permits and now you are dictating what we can and can not do. There is a reason for conceal carry and especially in state parks. Its for protection not only from the two legged predators out there but for unforeseen 4 legged ones. We go have to jump through hoops of fire to get them and would like to exercise our right to carry them. Face too many people are being attacked everyday and all it takes is for one person to try and attack the wrong person. In most cases the police will not get there in time and I would rather save my life then lose it waiting for law enforcement. So Gov Malloy stick to issues at hand that are more important like the economy and leave us law biding citizens alone. |

| Jeffrey O. Lockwood | Plantsville | Energy and Environmental Protection, Dept Of Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
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<td>Matthew Zangari</td>
<td>Berlin</td>
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<td>23-4-1(c) and 26-66-2</td>
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<td>Ralph J DeStefano</td>
<td>Thomaston</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/26/2013</td>
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<td>23-4-1(c) &amp; 26-66-2</td>
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<td>Brian Sokolowski</td>
<td>Seymour</td>
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<td>Handguns in State Forests/Parks</td>
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<td>23-4-1(c) and 26-66-2</td>
<td>1:01:36 PM</td>
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Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

Sincerely,
Ralph J DeStefano
<p>| Manuel Medina | manchester | Energy and Environmental Protection, Dept Of | Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: | 23-4-1(c)26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: | 10/26/2013 1:03:09 PM |
| Robert C Boughner | Greenwich | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: | 10/26/2013 1:05:10 PM |
|          |          |          |          |          | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations |          |
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<tr>
<td>Michael Scaduto</td>
<td></td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Handguns in State Parks</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Pistol Permit holders go through training, background checks and pay a lot of money to obtain these permits. Simply being in a State Forest or Park does not protect someone from being the victim of a crime. In fact, individuals in these Parks and Forests are more vulnerable due to there vast size and lack of law enforcement presence. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Thank you for your consideration,</td>
<td>Joseph P Birkenberger</td>
<td>10/26/2013 1:06:25 PM</td>
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<tr>
<td>Joseph P Birkenberger</td>
<td>Litchfield ct</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Pistol permit valid in state forest</td>
<td>23-4-1(c), 26-62-2</td>
<td>The state needs to remove the restrictions on personal protection in these areas. Unless the the state can guarantee my safety in these areas it should not restrict my ability to do so as a pistol permit holder. The states,(misguided, ignorant and week) legislators, along with governer McGoo have given the media and deranged criminals more power to create legislation than the law abiding citizens of this state. If they would inforce the laws allready on the books there would be less problems. Bad people doo bad things, this will never change. The lawes recently enacted have only restricting law abiding citizen's ability to protect themselves. Bad people dont abide by laws.</td>
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<td>Name</td>
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| Joseph Tonski        | Rockville       | Energy and Environmental Protection, Dept Of   | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Russell E. Cutler Sr.| Killingly       | Emergency Services and Public Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid permits to carry pistols and revolvers, to carry a handgun for self defense, specifically.  
1) Remove the prohibition on the carrying of firearms in Section 23-4-1 (c) of the Ct. Agencies Regulation.  
2) Add an exemption to 26-66-2, to allow the carrying of pistols and revolvers. ( including handguns using center-fire ammunition ) for the purposes of self defense. |
| Robert Moore         | Middletown      | Energy and Environmental Protection, Dept Of   | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Elvis Celebic | Wethersfield     | Energy and Environmental Protection, Dept Of | 23-4-1 (c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Steve McQ     |                  | Energy and Environmental Protection, Dept Of | carry handguns in state forests & parks | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Terry Lyons   | Oakdale          | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the "carrying of firearms" in section 23-4-1(c) of the Connecticut Agencies Regulations,  
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| Michael Golas      | Plantsville    | Energy and Environmental Protection, Dept Of    | Carry Handguns/State Forest/Parks 23-4-1 (C) Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Dain Vanderminde n | Ridgefield     | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Brett Small        |                | Energy and Environmental Protection, Dept Of    | carry handguns in state forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Ridgefield</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Richard K. Massini</td>
<td>North Haven, CT</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Joshua Beaulieu</td>
<td>Tolland</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Torrington</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Terry A Birt</td>
<td>Groton</td>
<td>Energy and Environmental Protection, Dept Of</td>
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| William Sprague| Marlborough | Energy and Environmental Protection, Dept Of                      | Carrying handguns in State Forests                                    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Gregory Funk   | Meriden  | Energy and Environmental Protection, Dept Of                      | Carrying handguns in State Forests                                    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Frank Vumbaca  | Meriden  | Energy and Environmental Protection, Dept Of                      | Carrying handguns in State Forests                                    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Edgar Ramirez   | Waterbury    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| William Talarico| Plantsville  | I don't know                        | allow individuals with valid Permit       |                        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: | 10/26/2013 1:27:50 PM |
| John Mazzotta   | Old Lyme     | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) & 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 1:33:24 PM |
| Justin Wiggins  | Waterford    | Energy and Environmental Protection, Dept Of | Handguns in state forests and parks | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<td>John Kornegay</td>
<td>Barkhamsted</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry handguns in State Forests: 23-4-1(c) and 26-66-2</td>
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| Patrick Mike   | Wethersfield| Energy and Environmental Protection, Dept Of| Carry handguns in State Forests: 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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| Scott E Berg   | Shelton    | Energy and Environmental Protection, Dept Of| Carry hand guns in CT forests: 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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<td>east granby</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>East Windsor</td>
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<td>Ismael</td>
<td>New Britain</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Dennis Golden</td>
<td>Simsbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in Parks</td>
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<td>Meriden</td>
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<td>Karin Blaschik</td>
<td>East Haddam</td>
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|                          |               |                                             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
|                          |               |                                             | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
|                          |               |                                             | - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
|                          |               |                                             | Thank you                                                             |            |
| Jeffrey Bertholf         | Oxford        | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | 10/26/2013 1:51:29 PM |
|                          |               |                                             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
|                          |               |                                             | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
|                          |               |                                             | - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
<p>|                          |               |                                             | Thank you                                                             |            |
|                          |               |                                             | Before securing a handgun permit we must qualify to shoot, therefore, why can’t we carry in State Forests and Parks. |            |</p>
<table>
<thead>
<tr>
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</table>
| Carl E. Passafiume | West Haven   | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 1:53:57 PM |
| Matt Odishoo       | Berlin       | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 1:56:00 PM |
| Carl Ornowski      |              | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 2:03:24 PM |
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<th>Issue</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Walter Radziszewski</td>
<td>New Britain</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>As a former Marine and licensed pistol permit holder, I earned the right to carry anywhere within the state of Connecticut!</td>
<td>10/26/2013</td>
</tr>
</tbody>
</table>
| Warren Bierwirth   | Beacon Falls   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013|
| Nicholas DuBaldo    | Manchester     | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>Thomas Grady</td>
<td>Ledyard</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 2:09:12 PM</td>
</tr>
<tr>
<td>Ben Walker</td>
<td>Bridgeport</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 2:15:31 PM</td>
</tr>
<tr>
<td>William P. Keller</td>
<td>Bethel</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 2:16:53 PM</td>
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<tr>
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</tr>
<tr>
<td>Alex Faulkner</td>
<td>Bethlehem</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forests</td>
<td>10/26/2013</td>
</tr>
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|                  |                |                                                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 2:18:39 PM |
| Robert Avery     | Colchester     | Energy and Environmental Protection, Dept Of    | Hand guns in State forests and park                                              | 10/26/2013 |
|                  |                |                                                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 2:18:48 PM |
| John             | Torrington     | Energy and Environmental Protection, Dept Of    | Handguns in state forest                                                           | 10/26/2013 |
|                  |                |                                                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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</tr>
</thead>
</table>
| John Hennessey   | Democrat | Simsbury | Energy and Environmental Protection, Dept Of | Carrying handguns Parks & Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 | 2:20:23 PM |
| Wade Frechette   |         | Putnam   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Thank you Governor Malloy | 10/26/2013 | 2:21:24 PM |
| Santo Mazzarella |         | Canton   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 | 2:23:02 PM |
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<tbody>
<tr>
<td>Ronald Fairfield</td>
<td>Fairfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry pistol in parks an State fore</td>
<td>23-4-1</td>
<td>The right to carry pistol in State forest and parks</td>
<td>10/26/2013 2:27:35 PM</td>
</tr>
<tr>
<td>Tahra Erickson</td>
<td>Marlborough</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Timothy R Ryan</td>
<td>Ellington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry in State Parks</td>
<td>23-4-1 c &amp; 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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</tr>
<tr>
<td>Joseph F. McVety Jr</td>
<td>East Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State Forests and Parks</td>
<td>23-4-1(c) and 26-66-2In</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Judah Thomas         | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Luke R Nearine       | R South Windham        | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 |
| Stephen Scarpa       | Oakdale                | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<tbody>
<tr>
<td>Thomas Phelps</td>
<td>Lisbon</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry Handguns in State Forests and</td>
<td>10/26/2013</td>
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<tr>
<td></td>
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<td></td>
<td>23-4-1(c) and 26-66-2</td>
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|                    |                  |                                             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
These locations are managed and funded through tax dollars from citizens who should have the choice whether or not to carry a firearm for protection in these locations. | 10/26/2013  |
| Stephen Bennett    | New Haven        | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests | 10/26/2013  |
|                    |                  |                                             | 23-4-1(c) and 26-66-2            | 2:39:32 PM  |
|                    |                  |                                             | Currently someone who is licensed to carry pistols/revolvers cannot legally carry a handgun/revolver in Connecticut state parks and state forests. Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013  |
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<th>Suggestion</th>
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<tbody>
<tr>
<td>Scott Bailey</td>
<td>Enfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c)</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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</tr>
<tr>
<td>Phil Lang</td>
<td>South Kent</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Aaron Freeman</td>
<td>New Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. I do not want the animals to know I'm unarmed, but I've no objection to their civil obligation of marksmanship.</td>
<td>10/26/2013 2:44:13 PM</td>
</tr>
</tbody>
</table>
| Gregory Boivin | Shelton | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | As someone licensed and qualified to carry a firearm in the State of Connecticut, I see no reason why it should be unlawful to carry my handgun in a State Forest or State Park.

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 2:46:18 PM |

| KAROL DEPTULA | ELLINGTON | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
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<tr>
<td>Gary B Coburn</td>
<td>Roxbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Edward Carle</td>
<td></td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the state agencies regulations to allow individuals with valid permits to carry pistols and revolvers, to carry a handgun for &quot;self defense&quot; while in Ct state parks and forests. Specifically: Remove the prohibition on &quot;carrying of firearms&quot; in section 23-4-1(c) of the Ct agencies regulations. Add an exemption to 26-66-2 to allow the carrying of Pistols and Revolvers (including handguns using center-fire ammunition) for the purposes of Self Defense. Thank You.</td>
<td>10/26/2013 2:53:15 PM</td>
</tr>
<tr>
<td>George Coyle</td>
<td>Branford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry handguns in st. parks and forest</td>
<td>23-4-1(c) 26-66-2</td>
<td>Allow those with permits to carry to carry in State Parks and Forest. Remove all regulations against it.</td>
<td>10/26/2013 2:53:54 PM</td>
</tr>
<tr>
<td>Name</td>
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<td>Agency</td>
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| Dewey Brooks | Stamford     | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013   | 2:59:25 PM    |
| joe pugliese | Southington  | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013   | 2:59:42 PM    |
| Armand Maniccia, Jr. | Torrington | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<th>Name</th>
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<th>Handgun Regulations</th>
<th>Handgun Permit Holders</th>
<th>Comment</th>
<th>Date and Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adam Czepiel</td>
<td>Old Saybrook</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handgun carry regulations in state</td>
<td>Handgun permit holders should be able to 'carry' in state parks</td>
<td>Thanks for the opportunity to comment</td>
<td>10/26/2013 3:05:16 PM</td>
</tr>
<tr>
<td>Joseph Lipsky</td>
<td>Naugatuck</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Handgun permit holders should be able to 'carry' in state parks</td>
<td>Respectfully request that you modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 3:06:09 PM</td>
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<td>Matthew Jorgensen</td>
<td>Columbia</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
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<tr>
<td>Lauren Jorgensen</td>
<td>Columbia</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
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<tr>
<td>Amy Kelly</td>
<td>Madison</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>10/26/2013  3:12:43 PM</td>
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<tr>
<td>john</td>
<td>middletown</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>10/26/2013  3:16:11 PM</td>
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<td>Jeffrey Roberts</td>
<td>Winsted</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<tr>
<td>Linda Combe</td>
<td>Rocky Hill</td>
<td>Energy and Environmental</td>
<td>Carrying handguns in state forests</td>
<td>As a woman who likes to hike alone, a lonely state forest or park is the FIRST place I would want to be able to protect myself.</td>
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<td>Protection, Dept Of</td>
<td></td>
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<td>23-4-1(c) and 26-66-2</td>
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<tr>
<td>Merrill Brown</td>
<td>Ridgefield</td>
<td>Energy and Environmental</td>
<td>Carrying handguns</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations</td>
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<td>Protection, Dept Of</td>
<td>State Forests &amp; P</td>
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| Anthony Perrelli      |                             | Energy and Environmental Protection   | 23-4-1(c) and 26-66-2           | Modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 3:26:44 PM|
| Edward J. Carson Jr.  | Hamden                      | Energy and Environmental Protection   | 23-4-1(c) and 26-66-2           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 3:31:04 PM|
| Jose L Santiago       | New Britain                 | Energy and Environmental Protection   | Carrying handguns state forest/park | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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Thank you for your time | 10/26/2013 3:32:18 PM|
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| Allen Egerton    | Waterford| Energy and Environmental Protection, Dept Of | handguns in State Forests/Parks | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 3:34:37 PM |
| Paul Reilly      | Stratford| Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 3:36:16 PM |
| Rick Weinberger  | Manchester| Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Carrying status</th>
<th>Regulation section(s)</th>
<th>Modification Request</th>
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</table>
| Carl Kniess     | Wallingford | Energy and Environmental Protection, Dept Of | carry handguns in state parks | 23-4-1(c) and 26-66-2 | Please modify the state agencies regulations to allow individuals with a valid permit to carry pistols and revolvers to carry a handgun for self-defense while in CT state parks and forest. Specifically:  
  - Remove the prohibition on the carrying of firearms in section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using centerfire ammunition) for the purposes of self-defense. |
| Norman Breed    | Ledyard | Energy and Environmental Protection, Dept Of  | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| William         | Prospect | Energy and Environmental Protection, Dept Of  | carrying firearms for self protection | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Alexander Tabak | CCDL | Milford | Energy and Environmental Protection, Dept Of | Carry a Handgun in Forests and Park | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 3:43:33 PM |
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- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Remember and I don't think you do. We are all good citizens and No Honest hard working Citizen is looking for Gun Violence. in fact it is just the opposite. However, by taking our ability to carry a gun for self preservation. is wrong in mine and many others opinions. The Police are not there when Violent Crime's are committed against Good citizens. they Usually arrive after all is said and done. I know this as FACT I am an innocent victim of a Robbery and Shooting which almost left me dead. I still do not understand the Logic of taking a person's right to carry a gun to help them protect against Criminals that carry guns. I do carry a gun and so does my wife. The furthest thing from our minds is to commit Violent acts against a fellow citizen. I hope you find it in this reading it does make common sense.

I know you hate guns I know you cant stand people that carry guns for protection. I am not sure why? You have body guards that are armed for your protection. WHY? same reason we feel the need to carry a Firearm. We/You do not want to to be a victim of gun violence. Just like you. You have the same right as I do please consider. looking at things differently rather than blaming the good citizen's that want nothing more than to protect themselves. Unless it is true that this taking guns out of the hands of all of the Model citizens is truly just about controlling them. I hope that is false. thank you very much.

Sincerely
William L. Kuhns
| Joseph A. McNally | Life member NRA, North American Hunter | New Milford | Energy and Environmental Protection, Dept Of | carrying handguns in state parks an | 23-4-1 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense | 10/26/2013 3:48:18 PM |

| Mahesh Reddy | Trumbull | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | What's this, is it true that we cannot carry a concealed weapon on State Park property. Why would you like to introduce a new permit to carry a permit so additional charges can be levied on the Citizens of CT. Let America be, don't turn it into a Soviet State, they (Soviet States) don't work! | 10/26/2013 3:48:44 PM |

| Stephen Crowley | Coventry | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Michael Goode       | Berlin    | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 3:51:46 PM |
| Francis Valente     | Shelton   | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 3:53:07 PM |
| Byron & Theresa Tillett | Windsor Banking, Dept Of Predatory Banking Practices | Make these banks process payments as they come in - we have been making payments every 2 weeks so that we'd end up paying the mortgage off 7 years early on our 30 yr mortgage (currently 5.25% started at 6.5% prior to the streamline) & when Freedom Mortgage did the streamline to lower our interest rates in late 09 they stopped processing our payments as they went in electronically to them & now they are trying to charge us over $6,000 + even though we've been making these payments all along from the start in Feb 09 with our Initial Mortgage & they told us to stop making the payments until the streamline was completed because it was changing the numbers during the processing - at the Housing Help Event at the Convention Center this Tuesday Oct 22 the Urban league Worker told us to be late & not make our customary payment while she tries to get Freedom Mortgage to come to the table but she does not think that they will cancel out the fees they are wrongly trying to force upon us even though we've been making payments all along & FHA loans Do Not Have Pre-Payment Penalties the way that Freedom Mortgage is not processing the payments & charging fees they are acting in a predatory manner & imposing upon us Pre-Payment Penalties & this is just wrong |
| william connole | granby Energy and Environmental Protection, Dept Of Carrying handguns in State Forest | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 3:53:58 PM |
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| David J. Ribnicky | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 3:54:19 PM |
Hi-

I request our state modify our agency regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense and protection of others while in CT State Parks and Forests.

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations

- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

Our state permit holders have already been under review and from my experience are serious, responsible, and an asset to our communities. Having legal permit holders unarmed protects no one but the criminals who do not obey our laws. In addition, many parks/forests are often isolated areas placing those on site in greater jeopardy if trouble arises.

Respectfully,

Steven R. Urbanski
Suffield, CT 06078
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<tr>
<td>Cathy Bloxsom</td>
<td>Stratford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carrying handguns in state forests 23-4-1 (c) &amp; 26-66-2 please modify state agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in Connecticut State Parks and Forests. Specifically: remove the prohibition on the carrying of firearms in section 223 -4 -1 (c) of the Connecticut agencies regulations and add an exemption 26-66-2 to allow the carrying of pistols and revolvers (including handguns using centerfire ammunition) for the purposes of self defense. thank you for your time. sincerely ,Cathy Bloxsom</td>
<td>10/26/2013</td>
</tr>
<tr>
<td>Garry Satula</td>
<td>Bethlehem</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Steven Palmer</td>
<td>Norwalk</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) &amp; 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Pat De Filio</td>
<td>Cheshire</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carry handguns in state forest Please allow people with gun permits to carry handguns in state forests. Remove the prohibition on Section 23-10</td>
<td>10/26/2013</td>
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<td>Ray Bevis</td>
<td>Wolcott</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please change the prohibition on carrying an legal firearm while in state parks and forest.</td>
<td>10/26/2013 4:07:03 PM</td>
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<tr>
<td>Robert Simeone</td>
<td></td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Connecticut residents should be able to defend themselves anywhere. Our lives are just as valuable outside the home as they are inside the home.</td>
<td>10/26/2013 4:09:06 PM</td>
</tr>
<tr>
<td>Kristopher Smith</td>
<td>Brooklyn</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Timothy       | New Hartford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | Please modify the State Agency’s Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                 | 10/26/2013   |
| CJ Hoppi      | Canton       | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                 | 10/26/2013   |
| Bob Erickson  |              | Energy and Environmental Protection, Dept Of | Carrying handgun in state forests          | I do a lot of hiking with my family at state forest and town trails and have had a ct hunting lic. that a require hunter safety state classes. Also have my ct. pistol permit and how can it be questioned about me carrying a pistol in any state forest or park.                                                                                                             | 10/26/2013   |
| Ryan Mateyov  | Middletown   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                 | 10/26/2013   |
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<th>Date Time</th>
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</table>
| Frank        | bristol   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| James Miller | wilton    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please allow individuals with valid Pistol Permits to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Sir,  
we are law abiding middle class citizens and should not be punished nor denied our rights. Please direct your efforts to removing guns possessed by criminals. A close inspection would reveal we are very different groups of people.  
Thank you for listening. |
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<th>Request</th>
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</table>
| Todd R. Smith         | Woodstock    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests 23-4-1(c) and 26-66-2             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 4:26:51 PM |
| Philip Einsmann Jr    | Westbrook     | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests 23-4-1(c) and 26-66-2             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 4:27:14 PM |
| Stephen Shuttleworth  | Ledyard       | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forests 23-4-1 (c) and 26-66-2            | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the "carrying of firearms" in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center fire ammunition) for the purposes of self defense | 10/26/2013 4:27:34 PM |
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<tr>
<th>Name</th>
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<th>Energy and Environmental Protection, Dept Of</th>
<th>Activity Description</th>
<th>Reference</th>
<th>Date</th>
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</table>
| Mike          | Middlefield | carrying pistols in state parks              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 23-4-1c & 26-66-2 | 10/26/2013 4:28:56 PM |
| Frank Holleran | Bridgeport | Carring handguns in state forests            | Please modify the state Agencies Regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT state parks and forests. Specifically:  
- Remove the prohibition on the carrying of firearms in Section 23-4-1(1) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers including handguns using center fire ammunition for the purposes of self defense. | 23-4 26-66-2 | 10/26/2013 4:29:38 PM |
| Dave Zyjewski  | Wallingford | Carrying handguns in State Forests           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 26-66-2. 23-4-1(c) | 10/26/2013 4:31:01 PM |
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| Bill Hansen     | North Haven  | Energy and Environmental Protection, Dept Of     | Carrying handguns in State Forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 4:31:59 PM |
| Brian Gaynier   | Higganum     | Energy and Environmental Protection, Dept Of     | Carrying handguns in State Forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 4:32:04 PM |
| Anthony Dilorenzo | Rocky Hill   | Energy and Environmental Protection, Dept Of     | Carrying handguns in State Forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 4:35:09 PM |
<p>| Faustino Barlan | Groton       | Energy and Environmental Protection, Dept Of     | Carrying handguns in State Forests Text | 10/26/2013 4:35:19 PM |</p>
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<tr>
<th>Name</th>
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<th>Department</th>
<th>Section(s)</th>
<th>Message</th>
<th>Date</th>
</tr>
</thead>
</table>
| Eugene R. Pino | Meriden       | Energy and Environmental Protection, Dept Of    | 23-4-1(c) and 26-66-2                     | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
As a Senior I still enjoy the open state parks and forest. But feeling safe is one thing I want. Carrying a firearm makes me feel that way. Without the option of carrying I would not feel safe in the state parks or forest.  
Thank you                                                                  | 10/26/2013   |
| Carl Barone   | Trumbull CT   | Emergency Services and Public Protection, Dept Of| Carrying handguns in State 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013   |
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| Rod Doyon    | Moodus            | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 4:39:03 PM |
| Tom Miller   | East Haddam       | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 4:42:28 PM |
| Elizabeth Johnson | Marlborough  | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 4:42:35 PM |
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| Jim Bartlett    | Scotland      | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests Please modify the States Agencies Regulations to allow individuals with valid Permits to carry Pistols and Revolvers to carry a handgun for self defense while in CT state Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in section 23-4-1(c) of the Connecticut Agencies Regulations.  
- Add an Exemption to 26-66-2 to allow the carrying of Pistols and Revolvers (including handguns using center-fire ammunition) for the purpose of self defense. | 10/26/2013 4:43:30 PM |
| Jarod Lojeck    | Stamford      | Energy and Environmental Protection, Dept Of | Firearms in state parks Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 4:43:53 PM |
| Daniel J. Cewe, Jr. | Glastonbury | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests I would like to see the State Agencies Regulations modified to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 4:46:36 PM |
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<tbody>
<tr>
<td>Frank C Van Vleck</td>
<td>North Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>handguns in State Forests/Parks</td>
<td>Please change the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in Connecticut State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Brian Mongeau</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>James Ritchie</td>
<td>Bristol</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Name</td>
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<td>Department</td>
<td>Action (Handguns in State Forests/Parks)</td>
<td>Specific Request</td>
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<tr>
<td>Ryan Nichols</td>
<td>New Britain</td>
<td>Emergency Services and Public Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Leo Gregoire</td>
<td>Meriden</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>enter Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
</tr>
<tr>
<td>Richard Weatherstone</td>
<td>Norwalk</td>
<td>Emergency Services and Public Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
</tr>
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</table>
There should be no difference in our ability to legally carry in our state forests and or our state parks versus any other open public land.

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.
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<td>John Mulrooney</td>
<td>Hamden</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 5:04:58 PM</td>
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<tr>
<td>Ramon DeJesus</td>
<td>Branford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>William Shields</td>
<td>Enfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Thank you!</td>
<td>10/26/2013 5:09:06 PM</td>
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<tr>
<td>Leonard Mausteller</td>
<td>Colchester</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
</tr>
<tr>
<td>Eduardo Torrealba</td>
<td>East Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<tr>
<td>robert simeone</td>
<td>famington</td>
<td>Emergency Services and Public Protection, Dept Of</td>
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| William Hillman  | Bethel        | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
As a permit holder, I have been checked out by my local police, state police, FBI reports. I am a responsible firearm owner, and as the author of several emails to my Senators, for all practical use, the originator of some of the changes to storage requirements enhanced this past year, I am well aware of safety.  
Should I be out in the woods, so to speak, I see no good reason that I should be prohibited from lawful and safe carry. |
|                  |               |                                     |                                 |                                                                                                                                                                                                                                                                                                                                                                                                   | 10/26/2013 5:21:39 PM   |
| John O'Luanigh   | Cheshire      | Energy and Environmental Protection, Dept Of | Handguns in State Forests & Parks | Please modify the State Agencies Regulations to allow law abiding individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests.  
Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
<p>|                  |               |                                     |                                 |                                                                                                                                                                                                                                                                                                                                                                                                   | 10/26/2013 5:21:57 PM   |</p>
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| Gregory Michael Zenger| East Lyme     | Energy and Environmental Protection, Dept Of| Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 5:22:36 PM |
| Albert LaTour         | Plainfield    | Energy and Environmental Protection, Dept Of| Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 5:24:59 PM |
| Rosellen Daddario     | East Lyme     | Energy and Environmental Protection, Dept Of| Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 5:25:44 PM |
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<tbody>
<tr>
<td>Ted Carnevale</td>
<td>Cheshire</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please revise the State Agencies Regulations so that individuals with valid permits are allowed to carry handguns for self defense in Connecticut State Parks and Forests. In particular, please (1) remove the prohibition on “carrying of firearms” in Section 23-4-1(c) of the Connecticut Agencies Regulations, and (2) add an exemption to 26-66-2 to allow carrying of pistols and revolvers (including handguns that use center-fire ammunition) for the purpose of self defense.</td>
<td>10/26/2013 5:26:51 PM</td>
</tr>
<tr>
<td>Philip Lang</td>
<td>Willington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Due to the fact that criminals will not follow the subject regulations...... Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 5:28:51 PM</td>
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<td>Edward P. Aldrich Jr.</td>
<td>Goshen</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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| Aaron Succow | Seymour    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Edward Seymour | Hamden | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Dan Kean     | Naugatuck  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) & 26-66-2 | lease modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 5:40:45 PM |
| Dominic Rea  | West Haven | Energy and Environmental Protection, Dept Of | carrying handguns in state forests | 23-4-1(c) and 26-66-2 | enough is enough get the illegal handguns off the street you are taking the easy route by going after the law abiding citizens, get the criminals I know it is a tougher job but it is one that needs to be done.  
  Dominic Rea | 10/26/2013 5:41:20 PM |
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<tr>
<td>Michael Asid</td>
<td>Oxford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry handguns in State Forests and Parks</td>
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<td>alex colombrito</td>
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| Chris Conti        | Weston            | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Garrett Foley      | North Canaan      | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Matthew Malecot</td>
<td>Middletown</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Handguns in State Parks</td>
<td>10/26/2013</td>
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<td>Hamden</td>
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| Cheryl Marcinko | Voluntown Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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| Cristie Brady | Hamden Energy and Environmental Protection, Dept Of | Carrying Hand Guns in State Forests | 23-4-1(C)26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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| FRANCES         | CCDL         | milford                                         | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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|                 |              |                                                 |                                             | - Add an exemption to 26-66-2 to allow the carrying of pistols and (including handguns using center-fire ammunition) for the purposes of self defense. |
|                 |              |                                                 |                                             | I carry only to protect myself and child. I would not feel safe in woods or secluded areas without my firearm. I want to enjoy all the state has to offer and feel safe.                                 |
| John Ludovico   | U.S. Citizen | Wallingford                                     | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
|                 |              |                                                 | 23-4-1(c) & 26-66-2                       | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Jeffrey Joy     | Meriden      | Energy and Environmental Protection, Dept Of   | Carrying handguns in State Forests        | Please remove the prohibition against carrying legal handguns by permit holders in Connecticut State Parks. Obviously, carrying a firearm does not endanger the environment or other persons. A permit to carry for personal protection. |

Jeff Joy
<table>
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<tr>
<th>Name</th>
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<th>Energy and Environmental Protection, Dept Of</th>
<th>Carrying handguns in state forests</th>
<th>23-4-1(c) and 26-66-2</th>
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| Eric Barkhurst     | Moosup         | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests | 23-4-1(c) and 26-66-2 | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| John M Donald      | Hartford       | Energy and Environmental Protection, Dept Of | Carrying handguns in state forest  | 23-4-1(c) 26-66-2    | please modify the state agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Dennis Cottrell    | Naugatuck      | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Devin Miles         | Torrington     | Energy and Environmental Protection, Dept Of    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Jennifer Martinsen | Torrington     | Energy and Environmental Protection, Dept Of    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 6:43:07 PM |
| Brian Elliott       | West Haven     | Energy and Environmental Protection, Dept Of    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Waterbury</td>
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| Vaughn Powell     | Stamford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| William J Carriere| Norwalk  | Energy and Environmental Protection, Dept Of | Handguns in state forests/parks | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<td>Bozrah</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/26/2013</td>
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<tr>
<td>Joseph Papa, Jr.</td>
<td>Derby</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State parks</td>
<td>10/26/2013</td>
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<tr>
<td>David Russ</td>
<td>Thomaston</td>
<td>Energy and Environmental Protection, Dept Of</td>
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| Heather Wolny | Thomaston Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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| Rocco Toce | Thomaston Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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| Brian Russ | Thomaston Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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| Nicholas Antonucci | East Haven | Energy and Environmental Protection, Dept Of    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 | 7:06:36 PM |
| Michael Silva | East Hartford | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| christine gray | Tolland | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| David Cornet  |          | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests                                  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:                                                                                                                       | 10/26/2013 |
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<p>| Francis Oneglia | Winsted   | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests                                  | Remove the prohibition on the &quot;carrying of firearms&quot; in section 23-4-1c of the Connecticut agencies regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center fire ammunition) for the purpose of self defense                                                                                                           | 10/26/2013 |
| Francis Oneglia | Winsted   | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests                                  | Remove the prohibition on the &quot;carrying of firearms&quot; in section 23-4-1c of the Connecticut agencies regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center fire ammunition) for the purpose of self defense                                                                                                           | 10/26/2013 |</p>
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<td>Stafford Springs</td>
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<td>Danbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State Forest/Parks</td>
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<td>Joshua Stevens</td>
<td>Southbury CT</td>
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| Alfred H Comeau    | Waterbury                | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forests | 23-4-1(c) and 26-66-2  
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| Kenneth Heidkamp   | Middlebury               | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2  
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| Christopher Sieranski | Stratford                | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 \nPlease modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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<td>Brett Ostapowicz</td>
<td>Wallingford</td>
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<tr>
<td>Joseph Markim</td>
<td>Middletown</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in state forests &amp; parks</td>
<td>10/26/2013 7:59:49 PM</td>
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| Wayne Covill | Newtown | Energy and Environmental Protection, Dept Of | Handguns in state parks/forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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| Joshua Wrinn | Norwalk | Energy and Environmental Protection, Dept Of | carrying handguns in state forests | 23-4-1(c) & 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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| Joseph Amirault | East Hartford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1 (c) & 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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<tbody>
<tr>
<td>Joshua Wrinn</td>
<td>Norwalk</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Sunday Hunting</td>
<td>Please review the law that says there is no hunting on Sundays. The deer population is way over crowded, and lime disease is getting worse and worse. I know multiple people who have been hospitalized multiple times with lime. Hunting could fix both these problems, but with a normal mans work schedule, there is never a time to hunt. There is no reason that we are now allowed to sell alcohol on Sundays, but law abiding citizens can't hunt. Please change this law already!</td>
<td>10/26/2013</td>
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| Steven D'Onofrio   | Tolland  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>michael sawrun</td>
<td>connecticut</td>
<td>Governor’s Office</td>
<td>governor malloy please remove 23-4-1 (c) from CT. state law books . it is it is useless and contrary since other firearms are permitted for hunting. also there are people who need to have protection from would be criminals in the forest. please add # 26-66-2 to the books to allow us law abiding citizens to have the right to protect ourselves when we and our families enjoy these beautiful places.</td>
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<td>resident</td>
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| Paul Ferrante | Unionville | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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I regularly hike with my dog in areas that have coyotes, bobcats and rabid racoons, not to mention bears. I am always worried that something might try to attack my dog and I will not have any way to protect her or myself. I do not want to hunt with a pistol, I just want it for personal protection. | 10/26/2013 8:21:55 PM |
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<td>Tolland</td>
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<td>CCDL</td>
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<td>putnam</td>
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<td>Canterbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Handguns in State Forest/p 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid permits to carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and forests. Specifically: - Remove the prohibition on the &quot;carrying of firearms&quot; in section 23-4-1(c) of the CT Agencies Regulations. - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 8:38:40 PM</td>
</tr>
<tr>
<td>Collin Sembler</td>
<td>Madison</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 8:39:56 PM</td>
</tr>
<tr>
<td>SHARYL MARINO</td>
<td>NORFOLK</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 8:40:14 PM</td>
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<tr>
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<td>Topic</td>
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</tbody>
</table>
| Gary Marino  | NORFOLK  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Bill Bowden  | Middletown | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2 | Please modify the state agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT state parks and forests. Please also remove the prohibition on the carrying of firearms in Section 23-4-1(c) of the Connecticut agencies regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers including handguns using center-fire ammunition for the purposes of self defense. |
| Vincenza Carey | Torrington | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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</tr>
</thead>
<tbody>
<tr>
<td>David</td>
<td>Naugatuck</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/26/2013 8:43:29 PM</td>
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<tr>
<td>Dan Fournier</td>
<td>Ellington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in state parks/forests</td>
<td>10/26/2013 8:46:47 PM</td>
</tr>
<tr>
<td>Joaquin Repollet</td>
<td>CCDL</td>
<td>Hartford</td>
<td>Carrying handguns in State Forests</td>
<td>10/26/2013 8:47:18 PM</td>
</tr>
<tr>
<td>Raul Garcia</td>
<td>Simsbury</td>
<td>Emergency Services and Public Protection, Dept Of</td>
<td>carrying handguns in state forests</td>
<td>10/26/2013 8:50:29 PM</td>
</tr>
</tbody>
</table>

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
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<tbody>
<tr>
<td>Jonathan Rousseau</td>
<td>New Britain</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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</tr>
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Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

With the amount of money I've spent and background checks I've gone through to obtain my permit I believe I should have the right to protect myself and those I care about in state forests.
<table>
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<tbody>
<tr>
<td>William Grace</td>
<td>East Windsor</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forests</td>
<td>23-4-1-c 26-6-2</td>
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 8:58:34 PM |
| Christopher Thiesing  | Somers            | Energy and Environmental Protection, Dept Of| Carrying handguns in state Forrest         | 23-4-1(c) and 26-66-2 | 10/26/2013 8:59:43 PM |
|                       |                   |                                             | I often bring my family into the state forests for hikes. Unfortunately while I am a pistol permit holder and military officer, I am not allowed to defend myself against wild animals or criminals that might take advantage of the seclusion to prey on my family.  
Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<tbody>
<tr>
<td>Steve Small</td>
<td>Southington</td>
<td>Governor's Office</td>
<td>State Park Firearm Regulations</td>
<td>10/26/2013</td>
</tr>
<tr>
<td></td>
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<td></td>
<td>I have a carry permit and, while I hardly ever actually carry my pistol, I was surprised to hear that I may not legally carry in a State Parks. It just doesn’t make sense. I understand banks for robberies, governments buildings to keep the whackos easily detained, or hospitals because they're full of intense situations. State Parks just don't seem to make common sense to me. Best regards, Steve</td>
<td>9:00:22 PM</td>
</tr>
<tr>
<td>Peter Salisbury</td>
<td>Salisbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carrying handguns in state forests</td>
<td>10/26/2013</td>
</tr>
<tr>
<td></td>
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<td>23-4-1(c) and 26-66-2</td>
<td>9:01:29 PM</td>
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|                 |               |                                         | Please modify the State Agencies Regulations to allow individuals with valid permits to carry handguns and revolvers for self defense while in Connecticut State Parks and Forests, Specifically:  
  - Remove the prohibition on the carrying of firearms in section 23-4-1(c) of the Connecticut Agencies Regulations.  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense. | 9:03:34 PM    |
| Patrick Brady   | Manchester    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests       | 10/26/2013    |
|                 |               |                                         | 23-4-1(c) and 26-66-2                    | 9:03:34 PM    |
|                 |               |                                         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
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<tbody>
<tr>
<td>Hank Altman</td>
<td>Killingworth</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State Parks/forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 9:05:31 PM</td>
</tr>
<tr>
<td>Rick Baldwin</td>
<td>Hartford</td>
<td>Aging, Connecticut Commission on pistol permits</td>
<td>I do have a &quot;carry&quot; permit &amp; my gun probably saved my life on 10-10-13 when I was attacked by two young men, as I got it out they ran away. I'm 69 &amp; just left St Augustine's Church MARG meeting. I want to be able to carry wherever I go, including to &amp; from &amp; even in state parks &amp; beaches.</td>
<td>10/26/2013 9:06:47 PM</td>
</tr>
<tr>
<td>Vin Soares</td>
<td>Tolland</td>
<td>Energy and Environmental Protection, Dept Of Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 9:07:45 PM</td>
<td></td>
</tr>
<tr>
<td>Richard Hiller</td>
<td>Tolland</td>
<td>Energy and Environmental Protection, Dept Of State Parks With the bear and possibly the mountain lion population increasing, I would hate to be walking along in my fishing gear smelling like fish without protection! I also work in corrections where the clientel really get to know you. Some of them don’t appreciate my line of work. Do I have to spell it out for you!?</td>
<td>10/26/2013 9:07:57 PM</td>
<td></td>
</tr>
<tr>
<td>Name</td>
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<td>Section(s)</td>
<td>Comments</td>
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<tr>
<td>John Johannemann</td>
<td>North Stonington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
</tr>
<tr>
<td>F W Baldwin</td>
<td>Hartford</td>
<td>Firearms Permit Examiners, Board Of</td>
<td>carry permits</td>
<td>My gun probably saved my life on 10-10-13 when I was attacked by two young men on Campfield Ave, just getting my gun out caused them to flee but not until I was badly injured. Perhaps permits for honest men over 60 could be relaxed so as to be easily attainable.</td>
</tr>
<tr>
<td>Joel Weinstein</td>
<td>Torrington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>David Zeppieri</td>
<td>Hamden</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>handguns in State Forests/Parks</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations – Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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</tr>
<tr>
<td>rick baldwin</td>
<td>Hartford</td>
<td>Governor's Office</td>
<td>gun permits</td>
<td>I was attacked by two young men on 10-10-13 &amp; escaped more grievous injury only by getting my gun out, which caused them to flee. Perhaps permits for the elderly could be expedited &amp; made much easier for those over 60 without a felony.</td>
</tr>
<tr>
<td>John Harmon</td>
<td>weatogue</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Because of the criminal and wildlife dangers possibly faced when hiking, please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. thank you</td>
</tr>
<tr>
<td>Richard DeWick</td>
<td>Hamden</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Carrying handguns in State Forests and Parks - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>William BArbour</td>
<td>North Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<tr>
<td>Dean Johnston</td>
<td>Litchfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Matt Jensen</td>
<td>MANSFIELD</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
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<td>Richard E Panzella</td>
<td>Haddam</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1 (c) 26-66-2</td>
<td>Please modify the state agencies regulations to allow persons with valid permits to carry pistols and revolvers to carry a handgun for self defense in state parks and forests. Specifically: Remove the prohibition on &quot;carrying of firearms&quot; in section 24-4-1 (c) in Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using centerfire ammunition) for the purpose of self defense.</td>
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| Matthew McBrien | Beacon Falls Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:51:40 PM |
|---|---|---|---|---|---|
| ANDRE BOURASSA | CDDL BRISTOL Emergency Services and Public Protection, Dept Of | 23-4-1(c) and 26-66-2 | Section 23-4-1(c) | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in the Connecticut Agencies Regulations | 10/26/2013 9:52:04 PM |
| Douglas Sharafanowich | Milford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  

Thank you for your consideration.  

Sincerely,  
Douglas Sharafanowich  
Milford, CT | 10/26/2013 9:53:02 PM |
| edward s. maccio | Bristol | Energy and Environmental Protection, Dept Of | enter Carrying handguns in State Fo | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/26/2013 9:54:42 PM |
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<th>Name</th>
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<th>Agency and Protection, Dept Of</th>
<th>Scenario</th>
<th>Date and Time</th>
</tr>
</thead>
<tbody>
<tr>
<td>Jack Cook</td>
<td>Bethlehem</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Handguns in state parks</td>
<td>10/26/2013 10:10:48 PM</td>
</tr>
<tr>
<td>anthony falanga</td>
<td>north branford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carrying handguns in State forests</td>
<td>10/26/2013 10:19:56 PM</td>
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Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

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<th>Action</th>
<th>Details</th>
<th>Date and Time</th>
</tr>
</thead>
<tbody>
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<td>Cory Duksa</td>
<td>Bristol</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>lease modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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</tr>
<tr>
<td>George Robinson</td>
<td>Plainfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Attacks by coy dogs and coyotes on people are happening more and more often and the basic right of a hiker or explorer to protect themselves against these attacks should be considered a personal right.</td>
<td>10/26/2013 10:30:18 PM</td>
</tr>
<tr>
<td>Rich</td>
<td>Berlin</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Handguns in State Parks</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Michele McBrien</td>
<td>Beacon Falls</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying pistols in ST Forests &amp; Pa 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 10:32:00 PM</td>
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<tr>
<td>Jeffrey C Hall</td>
<td>Stonington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 10:33:19 PM</td>
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<tr>
<td>Keith Soucy</td>
<td>Tolland</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry Handguns in State Forests and 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 10:43:40 PM</td>
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</tbody>
</table>
| Hector Torres         | Bridgeport     | Energy and Environmental Protection, Dept Of | Carry hand guns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Nicholas Lupacchino   | Eastford       | Energy and Environmental Protection, Dept Of | Handguns in State Forests/Parks | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
As a law abiding and permitted carry citizen we have passed all training and background requirements to be able to carry our handgun responsibly in most of CT. It is ridiculous that we are forbidden to carry in secluded and rural areas of the state parks and forests. |
<table>
<thead>
<tr>
<th>Name</th>
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<th>Issue Description</th>
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</tr>
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<tbody>
<tr>
<td>Louis Cipriano</td>
<td>Prospect</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/26/2013 11:03:14 PM</td>
</tr>
<tr>
<td>GAIL WHITRIGHT</td>
<td>MIDDLETOWN</td>
<td>I don't know</td>
<td>GUN CONTROL THERE SHOULD BE A TOTAL ANALYSIS OF ALL GUN CONTROL LAWS IMPLEMENTED BY THIS ADMINISTRATION AND NOT SUPPORTED BY THE MAJORITY OF CONNECTICUT RESIDENTS - YOU HAVE ENDANGERED ALL OF US</td>
<td>10/26/2013 11:03:23 PM</td>
</tr>
<tr>
<td>Donna Cipriano</td>
<td>Prospect</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Dan Burton</td>
<td>Ledyard</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Joseph E. Kushner</td>
<td>Southington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forests</td>
<td>10/26/2013</td>
</tr>
<tr>
<td>Ilya Korman</td>
<td>Milford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in CT Forests/parks</td>
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Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

Respectfully,
Joseph E. Kushner
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<tr>
<th>Name</th>
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<th>Section(s)</th>
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</tr>
</thead>
</table>
| William      | New London     | Energy and Environmental Protection, Dept Of | Carry Handguns StateForest & Parks | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/27/2013 12:00:35 AM |
| Anna Bongjorno |                | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/27/2013 12:02:20 AM |
| Brad Strogoff | Vernon         | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/27/2013 12:37:32 AM |
<table>
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<th>Issue Description</th>
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| Edward Seder       | Danbury        | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/27/2013 12:38:25 AM |
| Robert N. Starr    | Torrington     | Energy and Environmental Protection, Dept Of | Handguns in State Forests and Parks Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the "carrying of firearms" in Section 23-4-1(c) of the Connecticut Agencies Regulations.  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense. | 10/27/2013 12:47:55 AM |
| Wesley Moss        |                | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/27/2013 12:56:54 AM |
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<tr>
<th>Name</th>
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<th>Department</th>
<th>Issue</th>
<th>Modification Proposal</th>
<th>Date</th>
<th>Time</th>
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</thead>
<tbody>
<tr>
<td>Jonathon L. Ensign</td>
<td>Wethersfield</td>
<td>Energy and Environmental Protection, Dept of</td>
<td>handguns in state forests and park</td>
<td>Please modify the state agencies regs. to allow persons with valid permits to carry pistols and revolvers to carry handguns for self defence while in state parks and forests. Specifically: Remove the prohibition on carrying firearms in Sect. 23-4-1(c) of the Ct. State Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center fire ammunition) for the purpose of self defense.</td>
<td>10/27/2013</td>
<td>1:25:45 AM</td>
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<tr>
<td>John Desrosiers</td>
<td>East Haven</td>
<td>Energy and Environmental Protection, Dept of</td>
<td>Carrying handguns in State Forests</td>
<td>Sir, Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. This regulation violates the second amendment to the United States constitution in that it infringes on the citizen's right to keep and bear arms to defend him or herself. It also violates section 15 of the Connecticut constitution for the same reason. Please remember your oath to defend the constitution. There is no reason why the actions of a single criminal should ever be used to negate the rights of millions of law abiding citizens.</td>
<td>10/27/2013</td>
<td>2:49:28 AM</td>
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Sir,

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests.

Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

This regulation violates the second amendment to the United States constitution in that it infringes on the citizen's right to keep and bear arms to defend him or herself. It also violates section 15 of the Connecticut constitution for the same reason.

Please remember your oath to defend the constitution. There is no reason why the actions of a single criminal should ever be used to negate the rights of millions of law abiding citizens.
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<tr>
<th>Name</th>
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<th>3-4-1(c) and 26-66-2</th>
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</table>
| Scott Braunstein | Terryville | Energy and Environmental Protection, Dept Of | 3-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Douglas Sanderson | Moodus    | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Lisa Nilsen     | Danbury   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Shawn K Acri</td>
<td>North Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<tr>
<td>Patricia Nearine</td>
<td>South Windham</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Frank Papa</td>
<td>CCDL</td>
<td>Energy and Environmental Protection, Dept Of</td>
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| Eric Horgan  | Beacon Falls | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests                                    | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Richard DiTullio Jr | Roxbury | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests                                    | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Karen Crisci  | Roxbury     | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests                                    | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Richard Lalumiere</td>
<td>Clinton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Nick Provost</td>
<td>Brooklyn</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Peter Santoro</td>
<td>South Windsor</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Shawn Ruest  |              | Handgunsfor defense CTparks/forests          | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 23-4-1(c) and 26-66-2 | 10/27/2013 7:18:59 AM |
| Rod Bedard   | Pomfret      | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Stop making law abiding citizens seem like criminals. | Carrying Handgun in State Forests 23-4-1(c) and 26-66-2 | 10/27/2013 7:23:50 AM |
| Travis Mingo |              | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | Carrying if firearms in state parks Section 23-4-1(c) | 10/27/2013 7:24:35 AM |
<table>
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| Michael Ryan        | Ellington | Energy and Environmental Protection, Dept Of | Carry in State Parks | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Frank m Funaro      | East Haven| Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Lorenzo Quijano     | Branford  | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tbody>
<tr>
<td>Paul B. Kozikowski</td>
<td>Terryville</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<tr>
<td>Sean Cahill</td>
<td>Shelton</td>
<td>Governor's Office</td>
<td>right to carry firearms</td>
<td>Dear Governor Malloy, As a law abiding permit holding gun owner, I respectfully ask that you would consider legislation that would allow lawful citizens to carry firearms for protection in our beautiful state forests and parks.</td>
</tr>
<tr>
<td>James Ward</td>
<td>Oxford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Enter 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| James Virgulto              | Higganum         | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests                                                | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Noreen Virgulto             | Higganum         | Energy and Environmental Protection, Dept Of | Carrying handgun in ST forest/parks                                              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Michael Merrow              | Middletown       | Energy and Environmental Protection, Dept Of | Carrying handguns in state forest and                                             | the one place we are completely alone is when we are in the state forest and parks. we should be allowed to protect ourselves just the same as walking down the street or in our homes. with the resurgence of coyotes and black bears as well as the crazy people that seem to be everywhere we should be able to retain the right to carry in the woods that our permits allow us to do on the streets. the people that have pistol permits have already passed all the background checks required to prove their upstanding citizens. let us protect ourselves as the law should allow. |

10/27/2013 8:14:10 AM
10/27/2013 8:19:38 AM
10/27/2013 8:30:28 AM
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<tr>
<td>Debra Iaconiello</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry Handguns - State Forest/Parks 23-4-1(c) and 26-66-2</td>
<td>10/27/2013</td>
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<tr>
<td>Andrew Bell</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/27/2013</td>
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</table>

There are many women who visit state parks and forests. We are either alone, or in small numbers, or with our children. Some of us are victims of domestic violence and stalking. We are in large part unable physically to fend off one or more attackers should we be approached. We should not be prohibited from enjoying the beautiful parks and forests of Connecticut because we have lost the right to defend ourselves. As some will suggest, we can't always “find a man to defend us when we want to go there.” We need the right to protect ourselves. Please remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations. Also, add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Thank you!

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
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<td>Susan Reardon</td>
<td>Windsor Locks</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry Handguns in State Forest/Park</td>
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<td>Norwich</td>
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<td>carry a handgun for self defense while in CT</td>
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<td>Portland</td>
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<td>I am a responsible gun owner, and I hold a</td>
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<td>valid CT Pistol Permit. Why does this not</td>
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<td>sense. I must forfeit my right to protect</td>
<td>this. This regulation conflicts with the CT</td>
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<td>myself and family if I want to go on a hike?</td>
<td>Constitution. Please:</td>
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<td>If the goal of this is to reduce poaching,</td>
<td>- Remove the prohibition on the 'carrying</td>
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<td>this is not even close to the least restrictive</td>
<td>of firearms' in Section 23-4-1(c) of the</td>
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<td>approach to this. This regulation conflicts</td>
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<td>Nineteau</td>
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<td>with valid permits to carry pistols and</td>
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<td>revolvers to carry a handgun for self</td>
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<td>defense in state parks and forests,</td>
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<td>specifically remove the prohibition on the</td>
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<td>carrying of firearms in section 23-4-1c of</td>
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<td>Keith Hathaway</td>
<td>Waterford</td>
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| adam         | bridgeport   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Gerald Barnett | Enfield      | Energy and Environmental Protection, Dept Of | Handguns in State Forests/Parks           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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Governor Malloy is asking for a wide variety of input from the public on current regulations that affect Connecticut citizens in numerous ways. It is currently a violation of state regulations to carry a firearm for personal protection in state parks and state forests. Pistol Permit holders go through training, background checks and pay a lot of money to obtain these permits. Since the Governor is asking for change recommendations, please take this opportunity by using the instructions below.


- Fill out your Name, Email Address and Town.
- field Regulations Agency drop-down, Select "Energy and Environmental Protection, Dept of"
- field Regulation Subject Matter: enter Carrying handguns in State Forests and Parks
- field Regulation Section Number: Enter 23-4-1(c) and 26-66-2

In the Comments enter the following text:

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
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| Kathleen W. Lauretano | Lakeville                | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Law-abiding citizens who have gone through the laborious educational requirements, background checks, paperwork and fee process should not have their right to carry limited the way it currently is in State Parks and Forests. They are no more prone to misusing a firearm there than any place else out in the public so the restriction is illogical and absurd. | 10/27/2013|
| Michael Davitt  | Emergency Services and Public Protection, Dept Of | Handguns in state forests/parks             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
– Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | | 10/27/2013 |
| mark wootten | meriden ct | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Regulation Section Number: Enter 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| --- | --- | --- | --- | --- | --- |
| Bruce Towers | Morris | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Those of us who have taken the required safety courses and successfully passed background investigation have never constituted a threat to anyone historically and should be able to exercise our rights under the Constitution of The United States of America and the Constitution of the State of Connecticut, should we deem exercising that right necessary within the confines of Connecticut State Parks and Forests. | 10/27/2013 9:36:01 AM |
<table>
<thead>
<tr>
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<th>Issue</th>
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| Scott R Norris      | Enfield  | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests                                   | 23-4-1(c) and 26-66-2, Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/27/2013 9:40:51 AM |
| Keith Benson        | East Haven| Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests                                   | 23-4-1(c) and 26-66-2, Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/27/2013 9:42:15 AM |
| Jo Ann Roeter       | Shelton  | Energy and Environmental Protection, Dept Of| Carrying Handguns in State Forests                                   | 23-4-1(c) and 26-66-2, Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Issue Description</th>
<th>Number: Enter 23-4-1(c) and 26-66-2</th>
</tr>
</thead>
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| Murvin Tackling | New Britain | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests. Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| James Dempsey     | Enfield     | Energy and Environmental Protection, Dept Of | Carrying firearms in State Forests. Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 23-4-1(c) and 26-66-2 |
| Kary Daley     | Watertown    | Energy and Environmental Protection, Dept Of | Handguns in State Forests & Parks. Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Patrick Smedick |            |                                            |                                   |                       | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Robert Bamberg | Wallingford |                                            |                                   |                       | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Brian Duquette | Windsor Locks |                                            |                                   |                       | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Joseph Piechowski</td>
<td>Winchester</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carrying handguns in state forest</td>
<td>Please modify the state agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in Connecticut state parks and forests. Thank You, Joseph Piechowski</td>
<td>10/27/2013 10:03:16 AM</td>
</tr>
</tbody>
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| Wayne Courtemanche    | Glastonbury | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/27/2013 10:03:46 AM   |
| Stephen Bukowsky      | independent | Clinton                         | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<th>rebecca littmann</th>
<th>woodstock</th>
<th>Energy and Environmental Protection, Dept Of</th>
<th>carry handguns in state forests and</th>
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Robert Danaher

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<th>Milford</th>
<th>Energy and Environmental Protection, Dept Of</th>
<th>Carrying Handguns in State Forests</th>
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<td>It makes no sense that we can go armed on &quot;Main St.&quot; but not in our forests. This is especially silly given increasing populations of bears, not to mention the ever numerous human predators.</td>
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| Stephen Benzon        | Oxford        | Energy and Environmental Protection, Dept Of | Carry handguns in State Forests and Parks                                         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Ted Kuracz            | Windsor Locks | Energy and Environmental Protection, Dept Of | Carry handguns in CT Forest & Park                                                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Douglas Pelkey        | Enfield       | Energy and Environmental Protection, Dept Of | Carrying handguns St Forests/Parks                                                 | Please modify the State Agencies Regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Name</th>
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<th>Handguns in State Forests &amp; Parks</th>
<th>Regulations to Modify</th>
<th>Details</th>
</tr>
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</table>
| John Canning          | Wallingford | Energy and Environmental Protection, Dept Of | handguns in state forests & parks | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Cynthia Pelkey        | Enfield  | Energy and Environmental Protection, Dept Of | Carrying handguns St Forests/Parks | 23-4-1(c) & 26-66-2   | Please modify the State Agencies Regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT state parks and forests. Specifically:  
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- Add an exemption to 26-66-2 to allow teh carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Roger Peters          | Colchester | Energy and Environmental Protection, Dept Of | carrying of handguns in state fores | 23-4-1(c)26-66-2   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| ROBERT E. NIESYN              | CROMWELL    | Energy and Environmental Protection, Dept Of| Carring handguns in State Forests & 23-4-1(c) AND 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Matthew J Disbrow             | Bridgeport  | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Brian Walker | Fairfield | Energy and Environmental Protection, Dept Of | Handguns in state forests and parks | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Thank you.  
Sincerely,  
Brian Walker |
| Christopher Lockwood | Colchester | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Parks | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Jonathan Kittredge    |          | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Francis Niwinski      | Bristol  | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/27/2013 10:40:52 AM |
| S. Alan Shimp         | Vernon   | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Stephen Bordieri   | Bristol           | Energy and Environmental Protection, Dept Of Carrying handguns in State Forests | 23-4-1(c) and 26-66-2: Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Stephen Bordieri   | Bristol           | Energy and Environmental Protection, Dept Of Carrying handguns in State Forests | 23-4-1(c) and 26-66-2: Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/27/2013 10:48:45 AM |
| Gary R. Wheeler    | North Stonington  | Energy and Environmental Protection, Dept Of The Right To Carry in State Forests | 23-4-1(c) and 26-66-2: Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically, remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<th>Date and Time</th>
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| Geoffrey Wozny     | Stamford         | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Seth Walter        | South Windsor    | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Mike Stratigakis   | Bridgeport       | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Luis Rodriguez        |          | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| ROBERT KUCINSKAS      | BRISTOL  | Energy and Environmental Protection, Dept Of | CARRYING OF HANDGUNS IN CT STATE PA | 23-4-1 (c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self-defense while in CT State Parks and Forests, specifically: Remove the prohibition on "Carrying of firearms" in Sec 24-4-1(c) of CT Agencies Regulations and add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self-defense. |
| Bob Dragon            |          | Energy and Environmental Protection, Dept Of | 23-14-1 and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT State Parks and Forest Specifically.  
Remove the prohibition on the carrying of firearms in Section 23-4-1(c) of the CT Agencies Regulations.  
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<td>Winston A. Campbell</td>
<td>Bloomfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State Forests and Parks 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically, remove the prohibition on the &quot;carrying of firearms&quot; in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense.</td>
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| Yevgeniy Printsev     | Stamford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/27/2013 11:59:48 AM |
<p>| Gerald D. Hopkins     | Dayville | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests 23-4-1(c) 26-66-2 Please change the regulations to allow individuals with valid permits to carry a handgun in state parks and state forests for the purpose of self defense. Remove the prohibition on carrying firearms in section 23-4-1(c) and add an exemption to 26-66-2 to allow the carrying of pistols and revolvers using center fire ammunition for purposes of self defense. | 10/27/2013 12:06:47 PM |</p>
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<th>Name</th>
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</table>
| Richard Collette | Coventry   | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: 
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Fred M. Adkins |            | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: 
- Remove the prohibition on "carrying of firearms" in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense. |
| Mike Demo     | norwalk    | Energy and Environmental Protection, Dept Of | 23-4-1(c) / 26-66-2   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: 
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<tr>
<td>Andrew Hooper</td>
<td>Wallingford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Horatio John DeLuca</td>
<td>Shelton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/27/2013</td>
</tr>
<tr>
<td>Aaron Dean</td>
<td>Terryville</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Valid Pistol Permit holders go through training, background checks, and pay a lot of money in the State of Connecticut to exercise their Constitutional right to carry handguns in our State. That right should not be infringed in our State Forests and Parks where law enforcement officers are less readily available to protect us from harm.</td>
<td>10/27/2013</td>
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<tr>
<td>Name</td>
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| Ian McQuade   |                | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/27/2013 1:10:09 PM |
| ZACHARY WILEY | CT TAX PAYER   | NEW MILFORD                         | Handguns in State Forests/Parks           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/27/2013 1:14:49 PM |
| Melanie Maher | Canton         | Energy and Environmental Protection, Dept Of | Carrying handguns in state Forrest        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<tr>
<td>John Martin</td>
<td>North Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Handguns in State Forests</td>
<td>23-4-1(c) &amp; 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the &quot;carrying of firearms&quot; in section 23-4-1(c) of the Connecticut Agencies Regulations, and: Add an exemption to 26-66-2 to allow the carrying of pistols and revolver (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/27/2013 1:29:56 PM</td>
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</tbody>
</table>
| Geoff Viscount | Milford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | The State of Connecticut cannot guarantee the safety of its law-abiding citizens in its State Parks and Forests. The current law prohibits those of us who are law-abiding from carrying handguns in parks and forests. This does absolutely nothing, however, to stop criminals bent on committing a crime, or a rabid wild animal, such as a coyote, or even the possibility of a bear from attacking you. Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Thank you in advance for taking the time to read this. | 10/27/2013 2:11:11 PM |
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<td>Robert Staurovsky</td>
<td>Stratford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Cathy Staurovsky</td>
<td>Stratford</td>
<td>Emergency Services and Public Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Alejandro Sanchez</td>
<td>East Hartford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Name          | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Regulation Section Number: | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
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<tr>
<td>Adam Hummel</td>
<td>Berlin</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
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<tr>
<td>Mark Vanasse</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
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<td>Thomas Roybal</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Regulation Section Number: Enter 23-4-1(c) and 26-66-2</td>
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</table>
| Eric Letizia        | East Hartford    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
-Eric                                                                 | 10/27/2013 3:13:40 PM |
| Robert Bonin        | Wethersfield     | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  | 10/27/2013 3:13:59 PM |
| Jesse Roman | Weth | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. These are common sense changes that should have never been prohibited in the first place. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Barry Potter | Meriden | Energy and Environmental Protection, Dept Of | handguns in state forests & parks | 23-4-1(c) & 26-66-2 | Please modify the regulations to allow individuals with a valid pistol permit to carry handguns in CT state parks and forests for the purposes of self defense. |
| Anthony takacs | Naugatuck | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests | 23-4-1(c), 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<th>Subject</th>
<th>23-4-1(c) and 26-66-2</th>
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<tr>
<td>Robert McCarney</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Oxford</td>
<td>Carrying Handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</td>
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|                       |                                               |                   |                                  |                       | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                            |
| Michael J Malaro      | Retired Public School Administrator           | Clinton           | Firearms in State Parks/Forests  |                       | As that I am trained in the safe and reasonable carry of firearms (Civilian and Military Training/CT Pistol Permit to Carry Pistols and Revolvers), the State mandate that I am not allowed to legally carry in State Parks and Forests is not reasonable and practical.                                                                 |
|                       |                                               |                   |                                  |                       | 10/27/2013 3:53:34 PM                                                                                                                                                                                                                                                                                                                                         |
| Aaron Maitz           | Energy and Environmental Protection, Dept Of  | Meriden           | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to carry a handgun for self defense while in CT State Parks and Forests. Specifically:                                                                                       |
|                       |                                               |                   |                                  |                       | - Remove the prohibition on the "carrying of firearms" in section 23-4-1(c) of the CT Agencies Regulations  
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| Mark Cataldi     | Ashford  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Parks | 23-4-1 (C) 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Donna Lord       | Higganum | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Bob Burton       | Chester  | Energy and Environmental Protection, Dept Of | Handguns in state parks | | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Bennett Prescott | CCDL | New Britain | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Kyle Bates | Windsor Locks | Energy and Environmental Protection, Dept Of | Handguns in state forests/parks | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Cameron | Groton | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c), 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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| Orlando Gerena       | Danbury       | Energy and Environmental Protection, Dept Of    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: 
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | handguns in State Forests/Parks | 10/27/2013 4:49:42 PM |
| David M. Pontbriand  | Southington   | Energy and Environmental Protection, Dept Of    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: 
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | carrying handguns in state forests | 10/27/2013 4:53:45 PM |
| Gregg Beaty          | Madison       | Energy and Environmental Protection, Dept Of    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: 
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | carrying handguns in State Forests | 10/27/2013 4:56:10 PM |
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<td>Alexander Gust</td>
<td>Plainville</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Jason Puchalski</td>
<td>Hartland</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forest</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forest. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Frank M. Dawidowicz</td>
<td>Southington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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| alfonso mascolo       | berlin ct      | Energy and Environmental Protection, Dept Of      | carrying handguns in state forests                                  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Joe                   | thomaston      | Energy and Environmental Protection, Dept Of      | carrying handguns in state forest                                  | Please modify the state agencies regulations to allow individuals with valid permit to carry pistols and revolvers to carry handguns in state forest and parks. Specifically: remove the prohibition on the carrying of firearms in section 23-4-1(c) of the ct. agencies regulations. -add an exception to 26-66-2 to allow the carrying of handguns for the purpose of self defense. Thank you. |
| Michael Diakostavrianos | Glastonbury    | Energy and Environmental Protection, Dept Of      | handguns in State Forests/Parks                                    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
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<td>Robert Hauser Jr</td>
<td>Wallingford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<td>Stafford Spg.</td>
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<td>Christopher Sutton</td>
<td>Durham</td>
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| Victor DeCiucis Jr | Shelton| Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Ryan Dugan         | Branford| Energy and Environmental Protection, Dept Of   | Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Robert Roberge     |        | Energy and Environmental Protection, Dept Of   | Carrying handguns in State Forests         | 23-4-1(C) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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|                       | Protection, Dept Of state forrests and parks |           |                                 |                                                                         | 6:00:42 PM |
| Drew Covell           | NRA Life member supporter of 2nd      | Coventry  | Energy and Environmental Protection, Dept Of Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<p>|                       | Amendment and concerned citizen of CT |           |                                 |                                                                         | 6:21:54 PM |</p>
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<th>Name</th>
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<th>Carrying handguns in State Forests</th>
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<tbody>
<tr>
<td>Robert Harris</td>
<td>Middletown</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
<td>I find it problematic to leave my handgun in my vehicle at state parks, and a loss of an asset to the protection of the state that I cannot take the handgun I have trained with into state forests. This reduces the security of hiking trails and I personally find it worrisome during hunting pre-season, when I and other hunters are scooping out game trails, and risk attack of wild animals while doing so. Please allow individuals with valid Permits to Carry Pistols and Revolvers to do so while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>r rudolph</td>
<td>New Hartford</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>10/27/2013 6:32:44 PM</td>
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<tr>
<td>William Unger</td>
<td>Oxford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State parks an</td>
<td>That would be a good thing because of the increase of coyotes around which do attack humans and pets. I no longer walk in State areas because of the law, I now walk in town area's, which don't have that law.</td>
<td>10/27/2013 6:36:21 PM</td>
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<tr>
<td>Name</td>
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<tr>
<td>Christina M Boisits-</td>
<td>Southbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State parks and forests</td>
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<tr>
<td>O'Keefe</td>
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<td>23-4-1(c) and 26-66-2</td>
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<td>In Connecticut pistol permit holders go through training, background checks and pay hard earned money to obtain these permits. Please modify the State Agencies Regulations by adding an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Please also allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations. Thank you.</td>
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<td>Darrell York</td>
<td>Colchester</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying hand guns in ST forests &amp;</td>
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<td>23-4-1(c) and 26-66-2</td>
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| Roger Bourque   | Torrington | Energy and Environmental Protection, Dept Of | 23-4-1 (c) & 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Paul Somers     | Somers  | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Roger J Naldi Sr</td>
<td></td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Ccw on state forest and parks</td>
<td>Allow carry in the above location. Thank you. Expand carry locations for HR-218 (LEOSA) Card holders</td>
<td>10/27/2013 7:28:31 PM</td>
</tr>
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<td>John J. Bear</td>
<td>Colchester</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Voluntown</td>
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<td>William Bachlechner</td>
<td>Trumbull</td>
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<td>Ronald Benedict</td>
<td>Uncasville</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Natasha Saez</td>
<td>New Britain</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Newington</td>
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<td>Bryan Neumann</td>
<td>Milford</td>
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| Nelson Goewey         | Southington | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Gary Stango Jr        | Torrington | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Michael Lynch         | shelton   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Stefan Zavatone       | Glastonbury | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Dennis rose</td>
<td>Stamford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Gary Kendall</td>
<td>Oxford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Dave</td>
<td>Enfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry handgun in State Forests Park 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Edwin Fiallos</td>
<td>Derby</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Energy and Environmental Protection, Dept Of</td>
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<tr>
<td>William W O'Neill Jr</td>
<td>East Granby</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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| Brian Morey|               | Energy and Environmental Protection, Dept Of | Carrying handguns in state parks               | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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Regards,  
Brian Morey | 10/27/2013 10:23:45 PM |
| Milan Kupka | waterbury     | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| m. marek   | windsor locks | Energy and Environmental Protection, Dept Of | Carrying handguns in State Parks               | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Justin Bradley</td>
<td>Southington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<td>23-4-1(c) and 26-66-2</td>
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| KEITH OLSEN  |             | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 10/27/2013    |
|              |             |                                    | 23-4-1(c) and 26-66-2                | 11:44:14 PM   |
|              |             |                                    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Andrew Kulasenski | Plainville | Energy and Environmental Protection, Dept Of | Carrying handguns in State forests | 10/28/2013    |
|              |             |                                    | 23-4-1(c)and 26-66-2                 | 12:16:38 AM   |
|              |             |                                    | Please modify the state agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT state parks and forests. Specifically:  
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<tr>
<td>Nicholas Viccione</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td></td>
<td>Carrying Handguns on State Forests</td>
<td>Please modify the State Agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in State parks and forests. Specifically. Remove the prohibition on the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Thank You.</td>
<td>10/28/2013 1:43:07 AM</td>
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<tr>
<td>Paul Garre</td>
<td>Bail Enforcement Agent</td>
<td>Torrington, CT</td>
<td>Emergency Services and Public Protection, Dept Of</td>
<td>Carry in State Forests and Parks</td>
<td>We the pistol license holder should not be banned to carry in state Parks and State Forests. Not only is it our Constitutional right to bare arms, but it’s for our protection for ourselves and our families. Only criminals are the ones who shouldn't carry, felons etc, Paul Garre  CT BEA #23</td>
<td>10/28/2013 2:48:46 AM</td>
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<tr>
<td>Jonathan Mazza</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Farmington</td>
<td>Carrying Handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Forrest Andrews</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Waterford</td>
<td>Carrying handguns in State Forests</td>
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| Carl Passaro    |            |              | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests                                   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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|                 |            |              |                                                  |                                                                      |                                                                                             |            |
| tom brien       | Democrat   | Wallingford  | Energy and Environmental Protection, Dept Of    | Carrying handguns in forests & parks                                  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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|                 |            |              |                                                  |                                                                      |                                                                                             |            |
| Michael Caisse  |            | woodbury     | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests                                   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Phillip Carucci</td>
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<td>Carrying handguns in state parks</td>
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<td>Dayville</td>
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<td>Energy and Environmental Protection, Dept Of</td>
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<td>Stanley A Drauss Jr</td>
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<td>Energy and Environmental Protection, Dept Of</td>
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<td>Nancy Provost</td>
<td>Woodstock</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forest and Ponds in Connecticut. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Rob Davis</td>
<td>Gales Ferry</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2 - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Jesse Casey</td>
<td>Burlington</td>
<td>Emergency Services and Public Protection, Dept Of</td>
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<td>Geoffrey Willis</td>
<td>Coventry</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
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<td>thaddeus jones</td>
<td>rocky hill</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carrying handguns in state forest</td>
<td>23-4-1(c) and 26-66-2</td>
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<td>Michael St Pierre</td>
<td>Voluntown</td>
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Thank you,
Geoffrey Willis

Please modify the state agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
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<tr>
<td>George Nowosielski</td>
<td>Griswold</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Allow individuals with valid handgun permits to carry for self protection in state parks</td>
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<tr>
<td>Leonard Bergeron</td>
<td>Tariffville</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
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<td>Energy and Environmental Protection, Dept Of</td>
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| Arthur Abronzino, Jr.        | Wethersfield  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Michael                     | Sterling      | Energy and Environmental Protection, Dept Of | Carrying handguns in State forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Kevin Dougan                | Manchester    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  Thank you                                                                 |

10/28/2013 7:54:36 AM
10/28/2013 8:16:46 AM
10/28/2013 8:19:13 AM
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| Tanggol Caes    | REDDING   | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests   | 23-4-1(c) and 26-66-2 | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013 8:19:33 AM       |
| David Lee Volz  |           | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests   | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013 8:20:05 AM       |
| Ryan Delp       | CT resident | Newtown | Energy and Environmental Protection, Dept Of | Personal protection-State lands | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Please remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Please also add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  

Thank you for your consideration. | 10/28/2013 8:23:45 AM       |
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| Steven Fritsch     | Cromwell  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013 | 8:28:24 AM |
| Jeremiah McElligott| Meriden   | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013 | 8:32:00 AM |
| Joseph C. Benanti   | West Hartford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<th>Carrying handguns in State Forests</th>
<th>Requirement Details</th>
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</table>
| Donald Hayden | CCDL                                        | New Haven                          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers and to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013 8:38:13 AM |
| Fred Hutton   | sharon                                      | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Kirby Hawkes  |                                             | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Lynn Kessler</td>
<td>Winsted</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Elizabeth Esterley</td>
<td>Uncasville</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in State Parks and Forests. Thank You</td>
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<td>Lee Di Fabbio</td>
<td>Sherman</td>
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<td>Thomas Hallihan Jr.</td>
<td>North Haven</td>
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<tr>
<td>Michael Majeski</td>
<td>Newtown</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>in State Forsts/Prks</td>
<td>23-4-1(c) and 26-66-2</td>
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<td>Colchester</td>
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| Robert Sawyer | Griswold Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Matthew Mihaly | Trumbull Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013 9:10:39 AM |
| Robert Sawyer | Griswold Agriculture, Dept Of | Raw Milk | Please restore the right of farms to sell food directly to consumers without the burden of government oversight/regulation. Specifically, allow raw milk sales or farm share programs to enable consumers and farmers to work together. |                                                                                                                                  | 10/28/2013 9:11:26 AM |
Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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<td>David Mathew Jakubowski</td>
<td>eastford</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Charles R. Naumec</td>
<td>Mansfield Center</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<tr>
<td>Daniel Watson</td>
<td>Norwich</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Richard Clavet</td>
<td>Cheshire</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State Forest/Parks</td>
<td>10/28/2013 9:30:51 AM</td>
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<td>tim kollars</td>
<td>mansfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
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I am proud member of the Connecticut Citizens Defense League and an avid Constitutionalist.

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

These laws only affect the law abiding in a negative way and create "gun-free zones". As we have seen all too horrifically in the past few years in Newtown, the Washington DC naval yard, Aurora Colorado, and so on, these laws do nothing to stop violence.

Remove the prohibition on 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.
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<td>Luke Mihaly</td>
<td>Danbury</td>
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| Matthew Nowak    | Hebron         | Energy and Environmental Protection, Dept Of  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Glenn Anderson   | Simsbury       | Energy and Environmental Protection, Dept Of  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>David Bouchard</td>
<td>New Britain</td>
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| David LaFleche     | Lisbon             | Energy and Environmental Protection, Dept Of     | Carrying in State Forests and Parks                                              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| ed jacobsen        | southington        | Energy and Environmental Protection, Dept Of     | carrying handguns in state forests                                               | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Lee Cavanaugh      |                    | Energy and Environmental Protection, Dept Of     | Carrying handguns in State Forests                                               | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>ed jacobsen</td>
<td>southington</td>
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<td>carrying handguns in state forests</td>
<td>26-66-2</td>
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<td>Thomas</td>
<td>Fin, Fur, Feather Club</td>
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<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
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<td>James E Michaud</td>
<td>Vernon</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>10/28/2013</td>
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Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

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<tr>
<td>Douglas DeMars</td>
<td>Meriden</td>
<td>Energy and Environmental Protection</td>
<td>carrying handguns in state forests</td>
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<td>Matthew Bartlett</td>
<td>Thompson</td>
<td>Energy and Environmental Protection</td>
<td>Carrying handguns in State Forests</td>
<td>10/28/2013 10:30:12 AM</td>
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I am asking that you modify state regulations for state pistol permit holders to carry for self defense, in all state parks and forests.

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

My family and I have been hiking on state land and in parks for years. Growing up in the Town of Woodstock we had the tragedy of losing a public figure years ago now. She was raped and beaten to death while walking on a local road. If any of my family or I were hiking or walking on state land I would like to afford the opportunity to defend ourselves against those that could overpower us by brute force. Please keep this in mind while making your decisions.
<table>
<thead>
<tr>
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<th>Town</th>
<th>Department</th>
<th>Issue</th>
<th>Paragraphs</th>
<th>Date</th>
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| Robert Smith    |         | Energy and Environmental Protection, Dept Of    | carrying handguns in state forests        | 23-4-1(c) and 26-66-2, Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013 |
| William Walker  | Meriden | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2, Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Kenneth Nagy    | Tolland | Energy and Environmental Protection, Dept Of    | Carrying handguns in state forests         | 23-4-1(c) and 26-66-2, Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Newington</td>
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<td>Roy Bolieau</td>
<td>Stafford Springs</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Laura Bolieau</td>
<td>Stafford Springs</td>
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| John S. Chartier    | East Windsor        | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Gregory Cohen       | South Windsor       | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013    |
| Anthony A. Ganz     | Glastonbury         | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Steven L. Roy      | Middletown    | Energy and Environmental Protection, Dept Of | Carryin... | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Adam Andrusia      | Danbury       | Energy and Environmental Protection, Dept Of | Carryin... | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Zane Dargaty       | Danbury       | Energy and Environmental Protection, Dept Of | Carryin... | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>John Reilly</td>
<td>East Hampton</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>John F. Beidler</td>
<td>Southington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Michael Valentine</td>
<td>Newington</td>
<td>Energy and Environmental Protection, Dept Of</td>
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| Robert Snelgrove     | Trumbull   | Energy and Environmental Protection, Dept Of                    | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Andrija Jukic        | Milford    | Energy and Environmental Protection, Dept Of                    | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Garnet Drakiotes     | South Windsor | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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energy and environmental protection, dept of carrying handguns in state forests

23-4-1&26-66-2

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elaine torrington energy and environmental protection, dept of carrying handguns in state forests

23-4-1(c) and 26-66-2

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philip l. cypher jr. plymouth energy and environmental protection, dept of handguns in state forests/parks

23-4-1(c) and 26-66-2

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| Gil Kelly    | Wallingford| Energy and Environmental Protection, Dept Of     | Ask to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Thomas Patch | Hamden     | Energy and Environmental Protection, Dept Of     | Ask to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Please note - Nationally concealed carry permit holders are less likely to commit a crime with a firearm than is a duty trained and sworn police officer. |
| David Fernandez |          | Energy and Environmental Protection, Dept Of     | Ask to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Dennis Kendall      | Terryville    | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests      | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Joel Hryniewicz     | New Britain   | Energy and Environmental Protection, Dept Of| Handguns in State Forests/Parks         | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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Joel Hryniewicz     |
<p>| keith lestage       | danielson     | Energy and Environmental Protection, Dept Of| carrying handguns in state forests       | 23-4-1 (c) and 26-66-2 | Please modify the state agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in ct state parks and forests. Specifically: remove the prohibition on the carrying of firearms in the section 23-4-1 (c) of the Connecticut agencies regulations-add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |</p>
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| Corey Veneziano       | Burlington     | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Anthony Correia       | Milford        | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013 1:12:29 PM |
| Serge Mihaly Sr       | Trumbull       | Energy and Environmental Protection, Dept Of | Remove prohibition on carrying of firearms in Sec 23 -4-1-c) of the Ct Agency regulations. Add exemption to 26 66 -2 to allow the carrying of pistols & revolvers (including handguns using center fire ammunition) for the purpose of self defence. | 10/28/2013 1:15:18 PM |
| Alan Boudreau         | N/A            | Stafford Springs                       | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Jaroslaw Sejdor     | Wethersfield   | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Wayne Hopkins       |                | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Daniel Yungk        | Stonington     | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Windham</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<td>Thomas Thivierge</td>
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<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<td>Fred stark</td>
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<td>Emergency Services and Public Protection, Dept Of</td>
<td>Carry handguns in parks</td>
<td>10/28/2013 2:17:06 PM</td>
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<tr>
<td>Michael Scrivano</td>
<td>Columbia</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/28/2013 2:30:10 PM</td>
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Folks with permits should be allowed to carry in state forests and parks
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<th>Name</th>
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<tr>
<td>David</td>
<td>Norwalk</td>
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<td>Carrying handguns in State Forests</td>
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<td>Tom Pugliese</td>
<td>Rocky Hill</td>
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| Christopher Trudeau | Manchester  | Energy and Environmental Protection, Dept Of    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013 2:57:40 PM |
<p>| Harold J Pantely   | Torrington  | Energy and Environmental Protection, Dept Of    | Please reconsider the ban on carrying a firearm/handgun in a state forest for personal protection and/or self defense. While simply walking in woods near my home, I was cornered by a rabid racoon. Luckily, he did not attack but I was armed and able to defend myself if necessary, as I was on private land. But such things happen anywhere, state forests are not exempt from dangers. Firearm owners in this state are licensed and pass safety courses in order to carry a firearm for personal defense. They should not be penalized by laws not recognizing that fact. | 10/28/2013 3:01:33 PM |
| Eric Steinkraus    | Newtown     | Governor's Office                                | A one term limit for every elected office in the state including the Governor.                                                                                                                                         | 10/28/2013 3:01:39 PM |</p>
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<tr>
<th>Name</th>
<th>Role</th>
<th>Location</th>
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| Richard DeSerio | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013 3:08:54 PM |
| Joseph A. Cappello | Member       | Kensington       | Energy and Environmental Protection, Dept Of Carrying handguns in State Forests | 23-4-1(c) 26-66-2 Please modify the State Agency Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns that use center-fire ammunition) for the purpose of self defense. | 10/28/2013 3:11:21 PM |
| Matthew Terwilleger | Plymouth | Energy and Environmental Protection, Dept Of | Handguns in State Forests/Parks 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<th>Carrying handguns in State Forests</th>
<th>23-4-1(c) and 26-66-2</th>
<th>Proposed Changes</th>
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</thead>
</table>
| Theodore W Bogucki     | Andover                      | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                          |
| Charles Clayton        | Gales Ferry                  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                          |
| ROBERT KAROSY          | FAIRFIELD COUNTY             | FAIRFIELD FISH AND GAME                     | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| James Danielson      | Energy and Environmental Protection, Dept Of   | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2       | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013 4:01:02 PM |
| Bernard Sippin       | Fairfield Fish and Game Association     | Permit gun Holders right | 23-4-1 26-66-2             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: I have held a pistol permit since, 1953. I am a hunter, and use my guns for hunting deer, and birds. I have my pistol permit for protection and safety. I have to carry a certain amount of money on me for business purposes. Bernard Sippin | 10/28/2013 4:03:10 PM |
| Arthur R Calabrese III | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2       | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013 4:06:30 PM |
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<tr>
<td>JOSEPH SIMEK</td>
<td>NEWTOWN</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>CARRYING HANDGUNS IN STATE FORREST</td>
<td>23-1(C) and 26-66-2 please modify the state agency's regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense in CT state parks and forests specifically: - remove the prohibition on the 'carrying of firearms' in section 23-4-1(c) of the Connecticut Agencies Regulations. - add an examination to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense.</td>
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<td>John A. Naim</td>
<td>Danbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying hand gun in state forest a</td>
<td>23-4-1(c)26-66-2 Please modify the state agency regulation to allow individuals with a valid state permit to carry a pistol or revolver for self protection while in state forests and parks specifically Thank you</td>
</tr>
<tr>
<td>Donald Germain Jr</td>
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<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying of handguns in state parks</td>
<td>24-4-1(c) and 22-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Peter J. Hylenski</td>
<td>Danbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2</td>
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<td>Randall Kaufman</td>
<td>Branford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2</td>
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<tr>
<td>James G. Davis</td>
<td>Stamford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying hand guns in state parks 23-4-1 and 26-66-2</td>
<td>10/28/2013 4:37:34 PM</td>
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Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and forests.

Specifically:
1) Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations.
2) Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

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<tr>
<td>Brian J. Thibodeau</td>
<td>Bristol</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State forests</td>
<td>23-4-1(c) 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow law abiding permit carrying individuals the right to carry handguns and revolvers in state forests and parks.</td>
<td>10/28/2013 4:40:01 PM</td>
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</table>
| Kurtis Martel        | Old Saybrook     | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forests             | 23-4-1(c) and 26-66-2   | Governor Malloy, I enjoy walking my dog in state approved parks with my girlfriend. I would feel more confident if I, a fully licensed concealed pistol permit carrier, would be able to carry my firearm for our protection. Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Thank you, Kurtis Martel | 10/28/2013 5:03:22 PM     |
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<td>Jens Larsen</td>
<td>Scotland</td>
<td>Emergency Services and Public Protection, Dept Of</td>
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<tr>
<td>JAMES R WHELAN</td>
<td>new haven ct</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the state agencies regulations to allow individuals with valid permits to carry pistols and revolvers, to carry a handgun for self defense while in state parks and forests, specifically: remove the prohibition on carrying of firearms in section 23-4-1(c) of the Connecticut agency regulations. add an exemption to 26-66-2 to allow the carrying of pistols and revolvers including handguns using centerfire ammunition for the purpose of self defense</td>
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<td>Gary W. Carlin</td>
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<td>Mark Mitchell</td>
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<td>Energy and Environmental</td>
<td>Carrying handguns in State</td>
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<td>Permits to Carry Pistols and</td>
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<td>- Remove the prohibition on</td>
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<td>the 'carrying of firearms'</td>
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<td>in Section 23-4-1(c) of the</td>
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<td>Connecticut Agencies</td>
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<td>- Add an exemption to 26-66-2</td>
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<td>to allow the carrying of</td>
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<td>pistols and revolvers</td>
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<td>(including handguns using</td>
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<td>center-fire ammunition)for</td>
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<td>the purpose of self defense.</td>
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<td>Dan</td>
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<td>I don't know</td>
<td>Carrying of firearms</td>
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<td>parks and forests.</td>
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<td>Town</td>
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<td>Issue Description</td>
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<tr>
<td>Albert Magnani</td>
<td>Coventry</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/28/2013 6:34:49 PM</td>
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<tr>
<td>Donald Burdick III</td>
<td>Griswold</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/28/2013 6:39:21 PM</td>
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<tr>
<td>Jason Morrocco</td>
<td>Bristol</td>
<td>Emergency Services and Public Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/28/2013 6:47:09 PM</td>
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<tr>
<td>Robert k Mann</td>
<td>Thompson</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
</tr>
<tr>
<td>Scott Sanderson</td>
<td>Manchester</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>handguns in State Forests/Parks</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
</tr>
<tr>
<td>Eric Shanahan</td>
<td>Monroe</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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</tbody>
</table>
| Richard Bourbeau Jr. | Ellington      | Energy and Environmental Protection, Dept Of | Carrying hand guns in state forest | 23-4-1(c) & 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Scott Leming         | Mystic         | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
<p>| George Caruthers     | South Windsor  | Energy and Environmental Protection, Dept Of | Gun Control                    | P.A. 13-3 and 13-220 | Please review P.A. 13-3 as amended by P.A. 13-220 in regard to the laws banning &quot;assault&quot; weapons and large capacity magazines. The requirement for registration is way out of line and these bans will do little to reduce crime. |</p>
<table>
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<tr>
<th>Name</th>
<th>City</th>
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<tr>
<td>John Antosik</td>
<td>Manchester</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests; please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Ron McGuire</td>
<td>Easton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests; please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/28/2013</td>
</tr>
<tr>
<td>Dr. Gerald Strassberger</td>
<td>Norwalk</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests; please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests, and remove the prohibition on the &quot;carrying of firearms&quot; in Section 23-4-1(c) of the CT Agencies Regulations. Also, please add an exemption to 26-666-2 to allow the carrying of pistols and revolvers (including handguns using centerfire ammunition) for the purpose of self-defense.</td>
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<td>Name</td>
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</table>
| Mark Cannon     | Burlington| Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Tom Ward        | Energy and Environmental Protection, Dept Of    | carrying handguns in State Forests              | 23-4-1(c) and 26-66-2 | 10/28/2013 7:45:52 PM |
| RICHARD         | West Haven| Energy and Environmental Protection, Dept Of    | the right to carry state parks                | 10/28/2013 7:50:09 PM |
| Colleen Papa    | Derby      | Energy and Environmental Protection, Dept Of    | carrying handguns in state parks              | 23-4-1(c), 26-66-2  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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</table>
| Michael Dion | Bristol | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests    | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: 
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations 
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Patrick      |         | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests    | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: 
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| ron serianz  | newington | I don't know                          | weapons possession                        | 29-28e    | this section states that that if you carry a firearm in a building that is posted no firearms allow you are now committing a felony even if you have the proper permit.sec 29-37 spells out 3 years in prision.if a business post a sign no guns allowed and you do not see it it puts you in a bad place.i am not talking about schools ore courts but like meridan mall.this should be classified as an infraction |

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<th>Date/Time</th>
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<tr>
<td>Ron Pearsall</td>
<td>Cheshire</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry handguns in state forest/park 23-4-1(c) and 26-66-2</td>
<td>10/28/2013 8:11:08 PM</td>
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<tr>
<td>Frank Diterlizzi</td>
<td>Naugatuck</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2</td>
<td>10/28/2013 8:17:29 PM</td>
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<tr>
<td>Matt Halloran</td>
<td>Ashford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying of handguns in state forest 23-4-1(c) and 26-66-2</td>
<td>10/28/2013 8:28:04 PM</td>
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Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

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- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.
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<tr>
<th>Name</th>
<th>Location</th>
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<th>Carrying handguns in State Forests</th>
<th>23-4-1(c) and 26-66-2</th>
<th>Please modify the State agencies regulations to allow individuals with a valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in Connecticut State Parks and Forests. Specifically:</th>
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<tbody>
<tr>
<td>Robert Fountaine</td>
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<td></td>
<td>- remove the prohibition on the carrying of firearms in Section 23-4-1(c) of the Connecticut Agencies Regulations</td>
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<td></td>
<td>- add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense</td>
</tr>
<tr>
<td>Gerald Manion</td>
<td>Sandy Hook</td>
<td></td>
<td></td>
<td></td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</td>
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<td>- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations</td>
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<td></td>
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<tr>
<td>Michael Nowosielski</td>
<td>scotland</td>
<td></td>
<td></td>
<td></td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests, specifically Remove the prohibition on the 'carrying of firearms' in section 23-4-1(c) of the Connecticut Agencies Regulations- add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense</td>
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<tr>
<td>Michael Gates</td>
<td>Citizen</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>10/28/2013</td>
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<td>Energy and Environmental Protection, Dept Of</td>
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<td>Michael Thompson</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>10/28/2013</td>
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<tr>
<td>Domenic Latella Jr</td>
<td>CCDL</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>10/28/2013</td>
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<td>Energy and Environmental Protection, Dept Of</td>
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<td>8:56:12 PM</td>
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</table>

Please modify the State Agencies Regulations to allow law-abiding citizens with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

Thank you.
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<tbody>
<tr>
<td>Gary J. Knapik</td>
<td>Naugatuck</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>please modify state agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT state parks and forests. Specifically: Remove the prohibition on the carrying of firearms in section 23-4-1(c) of the CT Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/28/2013 9:03:31 PM</td>
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<tr>
<td>Marion McIntyre</td>
<td>Watogte</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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</tr>
<tr>
<td>John Laibrandt</td>
<td>Lebanon</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Modify the State Agencies Regulations to allow individuals with valid permits to carry pistols and revolvers to carry a hand gun for self defense while in CT State Parks and Forests. Remove the prohibition on the carrying of firearms, in Section 23-4-1(c) of the Connecticut Agencies Regulations. And add an exemption to 26-66-2 to allow the carrying of pistols and revolvers( including handguns using center-fire ammunition)for the purpose of self defense.</td>
<td>10/28/2013 9:18:54 PM</td>
</tr>
<tr>
<td>Todd Moler</td>
<td></td>
<td>Firearms Permit Examiners, Board Of</td>
<td>I would like the right to carry in state parks for personal protection. Thank you.</td>
<td>10/28/2013 9:29:32 PM</td>
</tr>
<tr>
<td>Name</td>
<td>Town</td>
<td>Agency and Department</td>
<td>Issue</td>
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<td>23-4-1(c) and 26-66-2</td>
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<td>- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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</tr>
<tr>
<td>Todd Pajonas</td>
<td>Easton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/28/2013</td>
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<td>23-4-1(c) and 26-66-2</td>
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<td>This is common sense so I am hopeful you will strongly consider making these changes.</td>
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<tr>
<td>Name</td>
<td>Location</td>
<td>Agency</td>
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</tbody>
</table>
| Andrea McClanaghan    | TORRINGTON          | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
As a mother and a woman, being able to protect my children is my first priority. Being able to protect myself falls in line with protecting my children. Whether it be from a dangerous/injured animal, or someone who wishes to do them or me harm. Please modify this regulation, so that I may enjoy our public rural parks in safety and with peace of mind.  
Thank you,  
Andrea McClanaghan | 10/28/2013 9:45:37 PM |
| William P. Healey     | Milford CT.         | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<tbody>
<tr>
<td>Cameron Duplessis</td>
<td></td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Alfonso D'Antonio</td>
<td>Storrs</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
</tr>
<tr>
<td>Michael Saar</td>
<td>North Branford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State Forests</td>
<td>Please allow gun carry permit holders to carry a handgun in state forests. I can carry a handgun on a crowded city street, but not all alone in the woods? I can hunt with a shotgun in the state forest, but I can't carry a handgun? What if I am attacked by a wild animal? Do you expect me to talk to the animal in a calm, soothing voice and tell him how I am very disappointed in him for chewing on my leg?</td>
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10/28/2013 10:09:17 PM

10/28/2013 11:06:14 PM

10/28/2013 11:10:25 PM
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<th>Department</th>
<th>Item Requested</th>
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</table>
| Rui DeSousa      | Sandy Hook  | Emergency Services and Public Protection, Dept Of | Carrying handguns in State Forests | As a law-abiding citizen, I’m growing tired of the continued unjust oppressive laws targeted at gun owners. Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013 11:13:19 PM    |
| Greg Hildebrand  | Middletown  | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013 11:18:21 PM    |
| Luis Hernandez   | HARTFORD    | Energy and Environmental Protection, Dept Of    | HANDGUNS IN STATE FOREST/PARKS   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/28/2013 11:47:06 PM    |
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<tr>
<td>Edward Sullivan</td>
<td></td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/28/2013 11:48:21 PM</td>
</tr>
<tr>
<td>Robert Mather</td>
<td>Wallingford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/29/2013 2:50:23 AM</td>
</tr>
<tr>
<td>Gerard Beck</td>
<td>Middletown</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Thank you.</td>
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<td>Name</td>
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<td>Carrying handguns in State Forests</td>
<td>Request Details</td>
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| Robert Isleib | Bolton     | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Jeremiah Borsoi | North Haven | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Albert Turro  | Stratford   | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Comment</th>
<th>Request</th>
<th>Date</th>
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<tbody>
<tr>
<td>Doug Ricci</td>
<td>Plainfield</td>
<td>I don't know carrying for personal protection in</td>
<td>I am in favor of being able to carry for personal protection. I am a senior citizen and live in a location surrounded by State forest. I feel I need the protection, it's wild out there and who knows who or what you can encounter. Thanks Doug Ricci</td>
<td>10/29/2013 6:10:37 AM</td>
</tr>
<tr>
<td>Robert Nelson</td>
<td>Redding</td>
<td>Energy and Environmental Protection, Dept Of Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>David Hyatt</td>
<td>Torrington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Have you ever been attacked by a rabid animal before? We that’s My wife and I hike in the woods all the time and have come face to face with wild life. In most cases we were safe but that one time a rabid fox was with in eye sight. We knew that we needed to move out of the way. The next time this opportunity should arise We need to be able to protect our self’s If the state turns this law into affect then we the people will have no protection from this or any other type of event that should arise. Please consider this as a good reason to allow carry in the state and federal forests. Thank you David and Susan Hyatt 1881 Mountain Road Torrington CT 06790</td>
<td></td>
</tr>
<tr>
<td>Donna Latella</td>
<td>Wallingford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Jonathan E Long</td>
<td>Riverton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying guns in State forests Please modify the State Agencies Regulations to allow individuals with valid permits to carry pistols and revolvers in Stat Parks and Forests. Remove the prohibition on the &quot;Carrying of Firearms&quot; in section 23-4-1(c) of the Ct. agencies regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers, including hand guns that use centerfire ammunition for the purposes of self defense.</td>
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<tr>
<td>Philip McDonald</td>
<td>Torrington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carrying Handguns in state Lands Please Modify the state Agencies Regulations to allow individuals with valid Permits to Carry Pistols and revolvers to carry a handgun for self defense in CT State Parks and Forest. Specifically; Remove the prohibition on the 'carrying of firearms' in Section 23-4-1 (c) of the Connecticut Agencies Regulations Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers(including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Levere F Starner</td>
<td>Ashford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Handguns in Connecticut St Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Thomas Buccieri     | New Milford  | Energy and Environmental Protection, Dept of | Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/29/2013 |
| Dr George Heinemann | Redding, CT  | Energy and Environmental Protection, Dept of | Carrying handguns concealed in Stat 23-4-1(c) and 26-66-2 I request modification to allow valid CT Pistol Carry Permit holders to be allowed to carry a handgun in state parks and forests for self defense.                                                                                                                                                   | 10/29/2013 |
| Scott Melancon      | Torrington   | Energy and Environmental Protection, Dept of | Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun, for self defense, while in CT State Parks and Forests.  
Specifically  
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| Kevin O'Brien      | Lisbon   | Energy and Environmental Protection, Dept Of | Firearms in State forests and parks | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| mark g gosselin    | meriden  | Energy and Environmental Protection, Dept Of | carry handguns in state forres,park | 23-4-1(c) 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Troy Musacchio     | Norwalk  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Parks | 23-4-1 (c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Department</th>
<th>Carrying Handguns</th>
<th>Section(s)</th>
<th>Remarks</th>
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</table>
| Paul D. Stiephaudt  | Stonington  | Energy and Environmental Protection, Dept Of    | in state forests  | 23-4-1(c) & 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Alan J Amato        | Cheshire    | Energy and Environmental Protection, Dept Of    | Carrying handguns | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Melanie McGuire     | Naugatuck   | Energy and Environmental Protection, Dept Of    | Carrying handguns | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</th>
<th>Date/Time</th>
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| Ellen Amato    | Cheshire       | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2              | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<p>| Terrence J. Grella | Harwinton    | Energy and Environmental Protection, Dept Of | carrying handguns in State Forests | 23-4-1(c) and 26-66-2                                                                 | 10/29/2013 9:01:38 AM |
| Thomas Gallo   |                | Energy and Environmental Protection, Dept Of | 23-4-1© and 266-66-2              | 23-4-1© and 266-66-2                                                                 | 10/29/2013 9:05:47 AM |</p>
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<tbody>
<tr>
<td>Casey Nunez</td>
<td>Stamford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Handguns in State Forests</td>
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</tr>
<tr>
<td>Leo</td>
<td>North Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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</tr>
<tr>
<td>Dan Devin</td>
<td>East Hampton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Firearms in State Parks</td>
<td>I am a 33 year military veteran having served twice with the Connecticut Air National Guard as well as many other military units. I support allowing concealed carry permit holders to carry a firearm in state parks and forests. Limiting our second amendment rights does not make us safer. It only emboldens the criminal who knows that law abiding citizens will be unarmed and unprotected. Keep the bad guys guessing and allow firearms in state forests and parks. Besides, how many incidents have we had of legal and licensed permit holders shooting up parks? Is this a solution looking for a problem?</td>
</tr>
</tbody>
</table>
Carrying handguns in State Forests 23-4-1(c) and 26-66-2

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
- Remove the prohibition on 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense.

Carrying handguns concealed in Stat 23-4-1(c) and 26-66-2

I request modification to allow valid CT Pistol Carry Permit holders to be allowed to carry a handgun in state parks and forests for self defense.

Carrying handguns in State Forests 23-4-1(c) and 26-66-2

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
- Remove the prohibition on 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense.

The reasoning being that our state parks are full of wild animals and in some case sick persons. There have been several cases in where bears have been sighted and or Coyote dogs have been present in these environments and have been threatening to persons and in some cases killed. As a state pistol permit holder, carrying a pistol in the woods and state parks is key to keeping people safe in these environments. I am not saying that folks should be willy nilly firing at animals, but if there is a real situation with a hungry animal or animals i sure want to be able to protect myself and family. Thank you
<table>
<thead>
<tr>
<th>Name</th>
<th>Town</th>
<th>Category</th>
<th>Statement</th>
<th>Date</th>
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<tbody>
<tr>
<td>Michael Wolf</td>
<td>South Windsor</td>
<td>I don't know</td>
<td>The MDC serving the Hartford metropolitan area imposes a surcharge on the accounts of water consumers from &quot;NMT&quot;s, which are non-member towns. In addition, it wants to install electronic-sensor-containing meters in our homes in lieu of the consumer self-reporting system that has been in place for at least the twenty one years that I have lived with MDC water. And in order to apply pressure to those who do not want electronic reporting devices in their homes, they refuse to review their bills, even when it is reported that they are too low. But the MDC is not overseen by anyone, not even the DPUC, because it is a government agency...not even when it functions outside its charter as when providing water to consumers in non-member towns. If indeed the MDC is a government agency-and case law at least imbues it with the powers and duties of municipalities--it is constitutionally required to redress the grievances of those under its authority. This is an area in which MORE regulation is needed, not less.</td>
<td>10/29/2013 10:13:33 AM</td>
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<tr>
<td>James Hill</td>
<td>Granby</td>
<td>Energy and Environmental Protection, Dept Of Carry in state forests</td>
<td>It is a clear violation of carry rights for citizens with valid carry permits to be denied that right on state parks and forests. Please remove that restriction. Than you.</td>
<td>10/29/2013 10:14:26 AM</td>
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<td>James Hill</td>
<td>Granby</td>
<td>Energy and Environmental Protection, Dept Of Carry in state forests</td>
<td>It is a clear violation of carry rights for citizens with valid carry permits to be denied that right on state parks and forests. Please remove that restriction. Than you.</td>
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| John C. Seymour       | Brookfield |                                               | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
|                        |            |                                               | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
|                        |            |                                               | - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10:32:29 AM   |
| Michael Friedman      | Stamford   | Energy and Environmental Protection, Dept Of  | Carrying handguns in state forests 23-4-1(c) and 26-66-2              | 10/29/2013    |
|                        |            |                                               | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
|                        |            |                                               | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
|                        |            |                                               | - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10:36:24 AM   |
| Jim Fantoli Jr        | Franklin   | Energy and Environmental Protection, Dept Of  | Carrying handguns in state forests 23-4-1(c) & 26-66-2               | 10/29/2013    |
|                        |            |                                               | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
|                        |            |                                               | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
<p>|                        |            |                                               | - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10:41:31 AM   |</p>
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| Chris Gorley | New Haven        | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
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| Richar Garner| New Haven        | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2

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| Don Feuerstein | Southbury       | Governor's Office         | Right To Carry in State Forests | Governor Malloy,

   People who are properly permitted to carry firearms should not be barred from carrying in state parks and forests. We all share the grief of what happened at Sandy Hook. I happen to live a short distance from there. But the firearms restrictions passed since are nothing but attempts by politicians who want to make it seem like they have done something. In fact they have not attacked the real problem at all. The right to bear arms is a sacred right given us by our founding fathers and it was done so for a reason. Very little has been done to protect the public from the criminals and emotionally ill people who are the real problems that need to be addressed. It is not the guns but the people who are the problem. Don

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</table>
| 10/29/2013   | 10:44:40 AM     | Chris Gorley              | chris.gorley@ct.gov          | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2

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| 10/29/2013   | 10:50:41 AM     | Richar Garner             | rgarner@ct.gov               | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2

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| 10/29/2013   | 10:51:24 AM     | Don Feuerstein            | don.feu@ct.gov              | Governor's Office         | Right To Carry in State Forests | Governor Malloy,

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John Glynne  
Energy and Environmental Protection, Dept Of 
Carrying handguns in State Forests  
23-4-1(c) and 26-66-2  
Allow pistol permit holders to carry in state forests and parks.  
10/29/2013 10:53:55 AM

Paul S. McNamara, Ph.D.  
Monroe  
Energy and Environmental Protection, Dept Of 
Carrying handguns in State Forests  
23-4-1(c), 26-66-2  
Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
10/29/2013 10:57:38 AM

kenton  
mystic  
Energy and Environmental Protection, Dept Of  
Handguns in state forest, parks  
23-4-1(c) 26-66-2  
Please modify the state agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT state parks and forest. Specifically:  
- Remove the prohibition on the "carrying of firearms" in section 23-4-1(c) of the Connecticut agencies regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
10/29/2013 11:02:40 AM

Lou Chavenello III  
Energy and Environmental Protection, Dept Of  
Handguns in State Forests/Parks  
23-4-1(c) and 26-66-2  
Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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10/29/2013 11:10:53 AM
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<td>David Larson</td>
<td>New Britain</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
</tr>
<tr>
<td>Randall Dumais</td>
<td>North Windham</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carry handguns in State Forests an</td>
<td>23-4-1(c) and 26-66-2</td>
</tr>
<tr>
<td>Ethan Seitz</td>
<td>New Hartford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
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</tbody>
</table>
| Giovanni Sanzo | SHELTON | Firearms Permit Examiners, Board Of | Handguns in state park restrictions | 23-4-1(c) and 26-66-2 | I respectfully request you modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers (handguns) for self defense/protection while in CT State Parks and Forests. Specifically requested:

- Completely Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations.
- Also to add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

While using these beautiful park areas there is no one there to protect me or my family. My only safety & protection would come my ability to carry a firearm. The Governor would have an armed security detail with him today to protect him should he visit these "gun free zoned" parks, yes? Then why should I be left disarmed? His life is no more or less worth protecting than mine or my families. That also further proves that a sign stating "gun free zone" do no work for if they did an armed security detail is not needed. Please allow me to protect myself and my family in said parks. Thank you |

| Eugene Seitz | New Hartford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations.
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/29/2013 11:30:51 AM | 10/29/2013 11:34:23 AM |
<table>
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<tr>
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<th>Topic</th>
<th>Regulations</th>
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| Stephen James | Newington | Energy and Environmental Protection, Dept Of | Carrying Handguns St. Forest/Parks | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Mike Testa   | Bridgeport| Energy and Environmental Protection, Dept Of | Right to Carry State Lands and Park |                          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Daniel Kopp  | Wilton    | Energy and Environmental Protection, Dept Of | handguns in State Forests/Parks | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<tbody>
<tr>
<td>Frank M. Kessler III</td>
<td>Somers</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State Forests/Parks</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/29/2013 12:12:56 PM</td>
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<td>Steven Hahn</td>
<td>Avon</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in forest/parks</td>
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<td>David Tiago</td>
<td>Monroe</td>
<td>Energy and Environmental Protection, Dept Of</td>
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| ricky willis| west haven | Energy and Environmental Protection, Dept Of    | carrying guns in state parks            | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/29/2013 1:13:31 PM |
| Scott Shultz| East Lyme  | Energy and Environmental Protection, Dept Of    | Carrying handguns in State              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/29/2013 1:14:11 PM |
| Kyle Geick  |            | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Theocdore M. Antonitis| Ridgefield     | Energy and Environmental Protection, Dept Of| 23-4(c) and 26-66-2  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/29/2013 1:17:45 PM     |
| Bernard Krieger       | Stamford       | Energy and Environmental Protection, Dept Of| carrying handguns in state forests | I ask that you please remove the prohibition on the carrying of firearms in section 23 – 4 – 1 (c) of the Connecticut agencies regulations.  
Also please add an exemption to 26–66 – 2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self-defense. | 10/29/2013 1:39:38 PM     |
| Scott Auten           | Shelton        | Energy and Environmental Protection, Dept Of| Carry handgun State Forests & Parks | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| David Andrade      | Stratford    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/29/2013 |
| Jesse Parris       | Stamford     | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/29/2013 |
| martin scuderi     | Ellington    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Date/Time</th>
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| Eileen Auten         | STRATFORD | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| John Chiaradio       | Bristol   | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/29/2013 3:04:27 PM |
| Oran J Spaulding Jr  | Seymour   | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| harland christofferson| guilford   | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2                       | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Jay Jones             | Branford   | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2                       | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/29/2013  |
| Joseph Evola          |            | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2                       | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Section(s)</th>
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</thead>
<tbody>
<tr>
<td>Fred W. Hopkins</td>
<td>Beacon Falls, CT</td>
<td>I don't know Carrying firearms in State Parks an</td>
<td>Sec. 23-4-1(c)</td>
<td>I strongly urge the Governor and the Legislature to review and reverse the regulations forbidding carrying of firearms in State parks and Forests. I urge them to allow permit holders to carry handguns for personal protection. Eliminate the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Michael Callahan      | Manchester              | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Leigh Standish        | Wethersfield            | Energy and Environmental Protection, Dept Of | Concealed Carry in State Parks          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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10/29/2013 4:12:52 PM
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| Eric G. Brickner    | Glastonbury       | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/29/2013    |
| Eileen J. Brickner  | Glastonbury       | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/29/2013    |
| Edward J. Brickner  | Glastonbury       | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>Paticia Pfile</td>
<td>Glastonbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/29/2013 5:18:33 PM</td>
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<tr>
<td>Dean Davis</td>
<td>West Suffield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/29/2013 5:35:53 PM</td>
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<tr>
<td>Gary A. Taylor</td>
<td></td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/29/2013 5:38:10 PM</td>
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<tr>
<td>Name</td>
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<td>Department</td>
<td>Carrying handguns in state forests</td>
<td>Action Description</td>
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| Salvatore Bonito | North Haven  | Energy and Environmental Protection, Dept Of  | 23-4-1 and 26-66-2                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                                   |
| beth switser | Naugatuck     | Energy and Environmental Protection, Dept Of  | carry hand guns state forest       | I would like to be able to carry a hand gun on state land, if u are out in the middle of the forest you don’t know what might happen. I have taken hand gun classes and pay for permits and i think it is my right.                                                                                     |
| Steven Valys   | Killingly     | Energy and Environmental Protection, Dept Of  | 23-4-1(c) and 26-66-2              | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Adam Santoro  |                   | Energy and Environmental Protection, Dept Of     | Carrying handguns in State Forests      | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/29/2013 6:27:17 PM |
| Scott Munger  | Wallingford       | Energy and Environmental Protection, Dept Of     | Carrying handguns in State Forests      | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Location</th>
<th>Position/Comment</th>
<th>Section References</th>
<th>Other Comments</th>
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<tr>
<td>Richard Pieczarka</td>
<td>Coventry</td>
<td>I don't know</td>
<td>The new gun laws</td>
<td>Are you kidding? Governor Mallow: In April you signed S.B. 1160 into law. You</td>
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<td>gave an answer regarding to the very gun law that you signed into law that did</td>
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<td>not agree with advice given to that same gun owner by one of your law enforcement</td>
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<td>agencies. You used e-cert and rushed S.B. 1160 into law. There is confusion</td>
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<td>among law enforcement agencies concerning the new law and even you gave</td>
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<td>information to a gun owner that was not in accord with the very law that you</td>
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<td></td>
<td></td>
<td></td>
<td></td>
<td>signed. My question to you: How long will it take for you to put in plain</td>
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<td></td>
<td>English so legal gun owners can understand what you intended with S.B. 1160?</td>
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<td></td>
<td>How soon can I hear from you regarding this very important matter?</td>
</tr>
<tr>
<td>Lee Howell</td>
<td>East Hampton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid</td>
</tr>
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<td></td>
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<td>in State Forests</td>
<td>Permits to Carry Pistols and Revolvers to carry a handgun for self defense</td>
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<td>while in CT State Parks and Forests. Specifically:</td>
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<td>- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of</td>
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<td>the Connecticut Agencies Regulations</td>
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<td>- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers</td>
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<td>(including handguns using center-fire ammunition) for the purposes of self defense</td>
</tr>
<tr>
<td>Raymond Kelly</td>
<td>Monroe</td>
<td>Lieutenant Governor, Office Of The</td>
<td>Pistol Carry</td>
<td>I think it would be impractical to forbid Law Abiding Citizens within the scope</td>
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<td>of their rights to not carry a self defense weapon in a state forest. Forests</td>
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<td>are not immune to crime, weather helping to protect another citizen or you and</td>
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<td></td>
<td>your Family.</td>
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<tr>
<td>Lorant Matyasovsky</td>
<td>I don't know</td>
<td>Carrying firearms in state parks</td>
<td>23-4-1</td>
<td>Remove this section 23-4-1 Add section 26-66-2 for pistol permit holders</td>
</tr>
<tr>
<td>Name</td>
<td>Town</td>
<td>Agency</td>
<td>Action Requested</td>
<td>Date</td>
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| John Fritz       | Stratford  | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| James Hall       | Wethersfield | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Charlie Eisenhofer | New Britain | Energy and Environmental Protection, Dept Of | Remove the prohibition on the carrying of firearms in section 23-4-1(c) of the Ct agencies Regulations  
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<th>Issue</th>
<th>Suggested Changes</th>
<th>Date/Time</th>
</tr>
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</table>
| Linda Czapinski      | Oxford     | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forest/P        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/29/2013 10:03:08 PM |
| Claudio Mejias jr.   | Meriden    | Energy and Environmental Protection, Dept Of | Carrying handguns in forest/parks          | Please modify the state Agencies Regulations to allow individuals with valid Permits to Carry pistols and revolvers to carry a handgun for self defense while in CT State Parks and Forest. Specifically: Remove the prohibition on the carrying of firearms in section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using centerfire ammunition) for the purpose of self defense. | 10/29/2013 11:33:20 PM |
| Paul Czyz            | Manchester | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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Thank you. | 10/30/2013 12:10:04 AM |
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<th>Carrying Handguns in State Forests</th>
<th>Regs Reference</th>
<th>Modified Regulations</th>
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| Kelsey Maloney | Voluntown  | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2                |                | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Terry Toth    | Monroe     | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2                |                | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Michael Gargano | Glastonbury | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2                |                | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |

10/30/2013 12:12:51 AM
10/30/2013 6:13:22 AM
10/30/2013 6:56:42 AM
| Howard M. Mills | Bridgeport | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

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| carl speaks | Groton | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/30/2013 9:21:10 AM |
| Name: Vanessa Brown | Department: Energy and Environmental Protection, Dept Of | Issue: Carrying handguns in State Forests | Reference: 23-4-1(c) and 26-66-2 | Message: Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | Date: 10/30/2013 10:16:19 AM |

<p>| Name: Robert Staurovsky | Address: Rockland Avenue Stratford, CT. 06614 | Phone: Cell 1-203-449-4321 | Message: To whom it may concern, the following was taken from the DEEP web site; &quot;Can I continue to hunt deer or small game with my Bushmaster AR-15 rifle? It depends on where you hunt, since possession is restricted. There are new requirements for the possession of certain types of center-fire assault style semiautomatic rifles and some shotguns which will require the owner to register those firearms with the Department of Emergency Services and Public Protection prior to January 1, 2014 (Download Registration Form). Once registered, those specific firearms still cannot be used on any public lands but they may be used for hunting on the owner's own property or on private lands with express permission of the landowner. Download a complete listing of the restricted firearms which require DESPP registration and can only be possessed under certain conditions.&quot; First off, to hunt deer in Connecticut you have to use a 6mm round or larger, an AR-15 is made in two calibers, the .223 or know as 5.56mm and the .308 caliber, so how is it that whom ever wrote this did NOT put in there that the .223 or 5.56mm can NOT be used for deer hunting, only 6mm or larger. It seems that alot of misinformation is being given out on state weapons and hunting laws or are people at the DEEP just making up laws as they feel? Robert Staurovsky 34 Rockland Avenue Stratford, CT. 06614 | Date: 10/29/2013 6:59:13 AM |</p>
<table>
<thead>
<tr>
<th>Name</th>
<th>Location</th>
<th>Agency</th>
<th>Topic</th>
<th>Regulations Ref.</th>
<th>Text</th>
<th>Date</th>
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</table>
| Pete Volkmar    | Waterford  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/30/2013 10:23:32 AM |
| Eric Baj        |            | Energy and Environmental Protection, Dept Of | Handguns in State Forests / Parks | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/30/2013 10:34:02 AM |
| Wesley Smith    | Somers     | Energy and Environmental Protection, Dept Of | handguns in state forests and parks | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Name</th>
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<th>Issue</th>
<th>Regulation Numbers</th>
<th>Proposed Changes</th>
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<th>Time</th>
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| Robert Lamson | Lebanon  | Energy and Environmental Protection, Dept of           | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/30/2013  | 10:56:14 AM   |
| Patricia Lamson | Lebanon  | Energy and Environmental Protection, Dept of           | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/30/2013  | 10:56:14 AM   |
| Laura Day    | Goshen   | Energy and Environmental Protection, Dept of           | Carrying handguns in State Forests | 23-4-1(c) & 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Thank you! | 10/30/2013  | 11:00:45 AM   |
<p>| Michael Brown |          | Energy and Environmental Protection, Dept of           | right to carry in state parks and forests |                     | would like the right to carry personal protection in state forest and parks | 10/30/2013  | 11:14:06 AM   |</p>
<table>
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<td>Robert Schacht</td>
<td>Bethel</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>10/30/2013</td>
<td>11:17:21 AM</td>
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<tr>
<td>Jeffrey McGurk</td>
<td>Granby</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>11:28:07 AM</td>
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<tr>
<td>Tony Bolton</td>
<td>West Hartford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>10/30/2013</td>
<td>11:49:46 AM</td>
</tr>
</tbody>
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| John | Bristol | Energy and Environmental Protection, Dept Of | Handguns in State Forests and Parks | 23-4-1 and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.
- We need the right to protect ourselves unencumbered by laws that criminals disregard. We have passed state scrutiny and should be allowed to carry for personal protection and to protect our families, friends, neighbors and fellow citizens at large from the evil deeds of the very few. |
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</table>
The Plant Group is a grower of perennial plants and uses overhead irrigation for our crops. The following is what we went through to get our permit to withdraw water from our pond and two wells.

I personally spent over 10 hours filling out a multiple page application and was determined to do so without hiring a consultant. There were one or two questions that I filed that the DEP said required a consultant.

I hired a consultant (approx $10,000) who proved incapable of securing the permit. I hired a second consultant at a cost of $35,000 and our application was accepted.

As a requirement of the permit we pay an annual fee of $940 and are required to record and submit our daily water consumption from each of our three water sources. Since the wells (and water meters) are separated by about one-quarter mile there is also a labor cost to keep daily records of these three readings.

I have a nursery competitor in Massachusetts who told me they had nothing like these requirements and expenses. In addition in a few more years I have to go through the permitting process again in order to renew my permit.

While the permitting process provides the DEP with every appropriate fact I think a less burdensome procedure is possible.

I would also like to point out that during my permitting process all DEP personal were helpful, courteous and pleasant to deal with.
<table>
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<tr>
<th>Name</th>
<th>Town</th>
<th>Agency</th>
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<th>Date of Action</th>
<th>Time of Action</th>
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<tr>
<td>Jason Pepin</td>
<td>Southington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forests 23-4-1 (c) and 26-66-2</td>
<td>10/30/2013</td>
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<td>Robert Magri</td>
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<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2</td>
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<tr>
<td>Mark Wierzbicki</td>
<td>enfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>10/30/2013</td>
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- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
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<td>Jon Popoli</td>
<td>Hamden</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State Forests/Parks</td>
<td>10/30/2013</td>
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<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to...</td>
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<td>carry a handgun for self defense while in CT State Parks and Forests. Specifically:</td>
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<td>Gary Fox</td>
<td>Monroe</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<tr>
<td>Kenneth</td>
<td>Wethersfield, Ct.</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in st. forrests.</td>
<td>10/30/2013</td>
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<tr>
<td>Salisbury</td>
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<td>Please modify the states agencies regulations to allow individuals with valid permits to carry pistols and revolvers, to carry a handgun for self defence while in ct. st. parks and forests. Specifically: Remove the prohibition on the 'carrying of firearms'in section 23-4-1(c)of the ct.agencies regulations.</td>
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<td>William Papp</td>
<td>Goshen</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Steven Murtha</td>
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<td>Energy and Environmental Protection, Dept Of</td>
<td>carrying handguns in State Forests</td>
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<tr>
<td>Gabriel Penagaricano</td>
<td>Glastonbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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Please change the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

Many areas of our state forests are quite isolated and I would very much like to have the ability to defend myself should the need arise.

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
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<td>Marie A. Robert</td>
<td>GLASTONBURY</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry handguns in State Forests 23-4-1(c) and 26-66-2 to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Justin Ankerman</td>
<td>West Hartford</td>
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<td>Donna Bacchiocchi</td>
<td>Shelton</td>
<td>Energy and Environmental Protection, Dept Of</td>
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| James Bacchiocchi | Shelton  | Energy and Environmental Protection, Dept Of  | Carrying handguns in State Forest/Park   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| jill craft    | harwinton| Energy and Environmental Protection, Dept Of   | Carrying handguns in State Forests       | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/30/2013 | 1:51:06 PM |
<p>| Bill Knapp    |          | Unaffiliated (looks like it is asking my political party) | Carrying handguns in State Forests       | Recommend repeal of this regulation. I can carry a shotgun - why not a handgun? Of course I mean only if I have the required permit(carry handgun permit). More background checking goes into that permit than into hunting license which is all I need to carry shotgun in forest. | 10/30/2013 | 1:59:35 PM |</p>
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<td>Kevin Guite</td>
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<tr>
<td>William Dennis</td>
<td>Berlin</td>
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<td>East Granby</td>
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<td>Carrying handguns in State Forests</td>
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<td>Jeffrey Perkins</td>
<td>Simsbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
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| Deborah Foehr | Bridgeport| Energy and Environmental Protection, Dept Of Real Estate | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Charles Grey  | Bristol   | Energy and Environmental Protection, Dept Of Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Ryan Sternal  | Berlin    | Energy and Environmental Protection, Dept Of Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Lisa A Jansson | Southington | Energy and Environmental Protection, Dept Of Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | From a woman who would like to exercise the right I already have to protect myself without worry of prosecution for simply surviving.... Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Thank you,  
Lisa A Jansson |
| Brian Vogel    | Stratford | Emergency Services and Public Protection, Dept Of Emergency Services and Public Protection, Dept Of | handguns in State Parks and Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| David M Sanford | Groton | Energy and Environmental Protection, Dept Of | Please modify the state agencies regulation to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT state parks and forests. Specifically:  
- Remove the prohibition on the ‘carry of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense. | 10/30/2013 5:27:02 PM |
Dear Governor Malloy,

Please allow individuals with valid permits to carry a handgun for self defense while in CT State Parks and Forests.

I use our state’s parks for hiking and fishing. In the last several years I have had many interactions with wildlife that have included:
- being ‘tracked’ by a feral dog (size of a wolf) for about 20 minutes before 3 coyotes chased after it (a very dangerous situation),
- finding ourselves in the midst of 2 black bears, presumably a mother and large cub,
- an encounter with a rabid raccoon that kept pursuing us and others,
- a bobcat challenged us, and
- a near tangle with a fisher cat.

My only options for self defense in these situations was woefully inadequate, I and or someone else could have been a seriously hurt or worse.

The environmental improvement and conservation efforts are working well. Wildlife is returning throughout the state with some species becoming abundant. The number of predators and large animals are also increasing as are the number of potentially dangerous encounters with people.

It is currently a violation of state regulations to carry a firearm for personal protection in state parks and forests. With the increasing presence of wild animals this is contradictory to common sense. Federal parks allow firearms for self defense. Forestry classes teach the need for firearms for self protection. A permit holder has been trained and vetted at state and federal levels. The regulations must be changed. Agreements with our neighboring states should also be pursued to cover situations where a trail briefly crosses state lines.

Please modify the State’s Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun.
for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

Thank you,

Jim Gagosz
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| F Majewski       | Montville| Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/30/2013 |
| Gary Todd        | East Hartford | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/30/2013 |
| Becky Sinosky    | Willington| Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Paul Johnson</td>
<td>Willington</td>
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<td>Carrying handguns in state park etc</td>
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<td>Richard Claus</td>
<td>Willington</td>
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<td>Carrying handguns in CT Forests park</td>
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<td>Joseph Ament</td>
<td>Colchester</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<td>Damian Sowa</td>
<td>New Britain</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2</td>
<td>10/30/2013 8:58:35 PM</td>
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|               |                 |                                                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |               |
| Jeff Robbins  | East Haddam     | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests 23-4-1(c) and 26-66-2                          | 10/30/2013 9:57:51 PM |
|               |                 |                                                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |               |
| Ron Powers    | Old saybrook    | Energy and Environmental Protection, Dept Of    | Handguns in state forest/ parks 23-4-1(c) & 26-66-2                             | 10/30/2013 10:16:58 PM |
|               |                 |                                                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Edward Donini</td>
<td>Milford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry in State Forest</td>
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<td>Richard K. Strobel</td>
<td>Waterbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forrests</td>
<td>10/31/2013 4:08:55 AM</td>
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<th>Requested Action</th>
<th>Details</th>
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| Thomas Armstrong | North Haven | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Parks | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Sincerely,  
Tom Armstrong |
| Walter Hagedorn | Milford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Thank you |

10/31/2013 7:06:05 AM | 10/31/2013 8:13:06 AM |
Joe Salemi

Energy and Environmental Protection, Dept Of

Carrying handguns in state forests

23-4-1(c) and 26-66-2

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
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Matthew Mucci

Energy and Environmental Protection, Dept Of

Carrying handguns in State Forests

Governor Malloy,

We have had our differences of late in regards to the new firearms legislation, but I come to you once again as part of our governmental process regardless of those differences. I ask that you support allowing open or concealed carrying of a firearm for purposes of self defense by those legally permitted to do so in CT within our state parks and forests. The current regulation that prohibits this is one that makes little sense given the ability to carry virtually everywhere else in CT and the fact that carrying a firearm for defense in an isolated area is desirous.

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
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</table>
| Cody Pereira          | Monroe         | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/31/2013 8:51:29 AM |
| Bruce Heine           | Ansonia        | Energy and Environmental Protection, Dept Of | Handguns in State Forests & Parks   | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/31/2013 9:11:49 AM |
| Jason Howard          |                | Energy and Environmental Protection, Dept Of | Handguns in State Forests/Parks     | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 10/31/2013 11:57:58 AM |
<p>|                       |                |                                   |                                      |              | The states and especially towns and cities have too many rules, red tape that deter business form beginning or staying in Ct. This hurst out economy. Some rules make no sense at all. Business owners can not devote a majority of their time filling out paper work for the state. | 10/17/2013 1:34:00 PM |</p>
<table>
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<tr>
<th>Sick of State Government red tape</th>
<th>Hurting small business:</th>
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<tbody>
<tr>
<td>New reformed Gun law P.A. 13-3</td>
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<td>This has hurt weapon and ammunition manufactures all over the Nation.</td>
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<td>It created a false sense of need to buy a new gun, your first gun and others to purchase just because they would be banned. Now we have dealers unable to sell certain guns and all peripheral accessories that go along with the sale. There are so many people buying ammunition to hoard that (many don’t own a weapon) it’s impossible to just go to your local dealer and make a purchase. How many million's of dollars are being lost. Loss equals tax dollars lost as well.</td>
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<td>I am a sportsman and all I do is shoot at paper or bowling pins. Belong to two well established ranges NRA Certified. I am concerned for my suppliers unable to do just that-supply.</td>
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<td>I also realize that this message will be mute to all, but I had to write and voice my opinion anyway.</td>
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<td>Sincerely,</td>
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<tr>
<td>Thomas W. Grieco</td>
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<tr>
<td>Ct. Infragard member</td>
<td>10/17/2013 2:19:00 PM</td>
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The State of CT’s regulations are overwhelming and drive businesses and wealth away. Specifically, its sales tax laws are exorbitantly complex and nearly impossible to follow, especially for construction contractors. Services should not be subject to sales tax in CT, but if they are going to be, the rules should be simplified to include all services in conjunction with a reduced rate across the board. The income tax should be the same: eliminate credits, exemptions, deductions and corporate/individual tax welfare in general and implement a lower, simplified, flat tax. I am a CPA whose business would likely suffer from reduced regulations and simplified tax laws, but since my state would benefit, I would gladly accept that tradeoff. Thanks, Dan.

Daniel F. Massucci, CPA/PFS, CFP
Massucci & Associates, LLC
www.massucci1.com
dan@massucci1.com
cell: (860) 919-8305
648 Main Street, Plantsville, CT 06479
phone: (860) 628-0434, (860) 668-6884, (203) 250-9298 - extension 101
fax: (860) 628-3737, (860) 668-7546, (203) 250-7515

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New IRS rules, which govern the way we conduct our tax practice, dictate that we give you the following notice: Any tax advice included in this communication (including attachments) is not intended or written to be used, and it cannot be used by any taxpayer, for the purpose of avoiding penalties that may be imposed on the taxpayer.
It is time for the Governor and Legislature to pay attention to the very fabric that keeps this State above water in budget and employment areas. This State is extremely un-friendly and non-supportive of the good businesses we have, instead the Governor and Legislature is spending millions of dollars of money we don’t have to bring business here. In the past the State of Connecticut has tried to entice companies to either stay or come here only to take the money and run. STOP IT! Get a real program going to help our economy and great workers. Stop the senseless gun laws and other idiotic ideas which are just driving out great businesses. It’s time for a change, maybe it’s time to change those in office who cannot seem to get anything right.

Ron Pariseau
39 Freedley Fork Road
Pomfret Center, CT 06259
Dear Sir or Madame:

In response to Governor Malloy’s initiative to review state regulations, I would like to say that the Department of Consumer Protection’s regulations as to bakeries and commercial kitchens are very burdensome for entrepreneurs like myself, who would like to start a home-based business. As you can see from reading the messages below, I have been in communication with Linda Kranmas about my desire to start a small bakery operation out of my home. I have a house in Newington that has an attached in-law apartment. Since we no longer have a tenant living there, I was thinking of using the kitchen in the apartment as a commercial bakery. Ms. Kranmas offered to come over and walk through the site to tell me exactly what I would need to change. I am grateful for her offer, and I plan to take her up on it eventually. However, I have to say that I am a little worried about what I would need to spend to renovate that space. I certainly don’t want to go so far out of the realm of a typical home kitchen that I would have to renovate it back again if the bakery business did not work out and I wanted to rent it out for residential use again. Do you see my point? It’s got to resemble a home kitchen even though I would use it exclusively for my business. For example, she said I would need a three-bay sink. I’ve never seen a home kitchen with a three-bay sink. Presently, I have a large single-bay sink in that area. I’m afraid I would have to rip out the plumbing and rebuild that entire existing wall of cabinets around the sink. Would that be overkill if I turned that space back into an apartment? She also states “all equipment to be NSF.” Is it practical to require commercial equipment in a start-up operation like mine? Assuming I can find it used at a place where they sell used restaurant equipment, would a future tenant feel comfortable using that NSF stove or refrigerator?

I might also mention that many states have begun incubator operations for specialty food businesses that allow entrepreneurs to rent a commercial kitchen on a per diem basis. Connecticut has nothing to offer in this regard that I am aware of. The closest incubator operation is 70 miles away, at the Franklin County (Massachusetts) CDC. I contacted them, and
they told me I am eligible to use their services even though I am not a Massachusetts resident. If it turns out that the renovations I would need to do in order to use my spare home kitchen are too extensive, I will be forced to travel to Massachusetts. I would rather not have to do this because it will involve my having to spend money on hotel accommodations, assuming I rent the kitchen for several days in a row and get a lot of baking done.

Here is the link for the Franklin County CDC: http://www.fccdc.org/

What I was hoping to do was to start with just a shoe-string budget while keeping my day job. I think you need to find a way to allow more flexibility in your regulations; otherwise, many people like me will get discouraged and either not pursue their ideas or move to another part of the country where the climate is more user-friendly toward entrepreneurs.

Sincerely,

Dana M. Lucisano
41 Garvan St.
Newington, CT 06111-2021
day time telephone: 203-574-8225

From: Linda.Kranmas@ct.gov
To: dll-2@hotmail.com
Date: Wed, 30 May 2012 15:16:15 -0400
Subject: RE: Setting up a home-based bakery business

Yes I am willing to do the walk-through for you however, the beginning of June- 1st. 2 weeks I will not be available. I work 7:30 AM to 6:00 PM Mon-Thurs so just let me know. If I am not available my supervisor is Tim Spillane and he may be able to
cover for me if I am not available. Hope this information is helpful. Good Luck

Linda I. Kranmas  
Department of Consumer Protection  
Food & Standards Division  
165 Capitol Ave. Room 165  
Hartford, CT. 06106  
Office #860-713-6160  
VM # 860-713-6189  
Fax #860-706-1265

From: Dana Lucisano [mailto:dll2@hotmail.com]  
Sent: Tuesday, May 29, 2012 6:21 PM  
To: Kranmas, Linda  
Subject: RE: Setting up a home-based bakery business

Dear Ms. Kranmas:

I'm glad that, at least, it's possible to have a home-based bakery. This was the kind of information I was seeking. Thank you for your help. I'll call you when I'm ready to make a deposit. Perhaps, you could do a quick walk-through.

--Dana Lucisano

From: Linda.Kranmas@ct.gov  
To: dll2@hotmail.com  
CC: Tim.Spillane@ct.gov  
Date: Tue, 29 May 2012 15:20:15 -0400  
Subject: RE: Setting up a home-based bakery business  

My name is Linda Kranmas and I am the inspector for the Town of Newington and the surrounding areas. The town would have to approve the use of your home for this purpose. Zoning, Fire Marshall, Health Dept. (may not be involved if you are only wholesaling but still touch base with them). The basement would be fine to use as long as your are set up for commercial use and the kitchen (bakery) is not to be used for any personal use at all.
It must be closed off from access to any pets, children and anyone not associated with the Bakery Business. You must have smooth easy to clean, impervious to moisture ceiling tiles, floors and walls are to be smooth and easy to clean. Perimeter of the bakery must be provided with a cove molding at the base juncture of the floor and wall to seal any openings. All equipment to be NSF, or equivalent equipment. A three-bay sink large enough to accommodate the largest utensil or pans or bowls used. Wash, rinse, sanitize with drain boards on either side to accommodate dirty and clean utensils. A Hand sink and a mop sink. Home bathroom may be used, however after its use hands must be washed there and then again when entering your baking area prior to the start of work. Windows are to be provided with screening. Depending on the Oven, may need to be vented to the outside. Ask the Fire Marshall. This information is not all inclusive as there may be items I did not mention. When you find where you are going let me know and I will be glad to look at it, please let me know.

Linda I. Kranmas
Department of Consumer Protection
Food & Standards Division
165 Capitol Ave. Room 165
Hartford, CT. 06106
Office #860-713-6160
VM # 860-713-6189
Fax #860-706-1265

From: Christie, Marcia On Behalf Of DCP.FoodandStandards
Sent: Friday, May 25, 2012 3:57 PM
To: Kranmas, Linda
Cc: Spillane, Tim
Subject: FW: Setting up a home-based bakery business

Please respond to Dana Lucisano’s e-mail. Thanks.

From: Dana Lucisano [mailto:dll-2@hotmail.com]
Sent: Thursday, May 24, 2012 3:12 PM
To: DCP.FoodandStandards  
Subject: Setting up a home-based bakery business

I am in the process of selling my house and, hopefully, buying another somewhere in Newington. Once I get settled, I would like to start a part-time bakery business out of my home to supplement my income. When I was on the Dept. of Consumer Protection website, I saw the application form I would need to fill out in order to get a bakery license. What I was hoping to find out is what you look for in terms of the physical layout or work space. If I was to buy a house with a finished basement that included a kitchen, separate from the family kitchen, could that qualify for a bakery license? Is there anything I should look for now, as I am searching for a new house?

Thank you for any guidance you can provide.

Dana M. Lucisano
Message from KMBT_C452
GOVERNMENT
REGULATION
REFORM. REALLY?

Here is the scanned version. The original bounced back.

Michael J. Knight, CPA, CVA, CFE
Knight Rolleri Sheppard CPAS, LLP
Ph (203) 259-2727 x 20 - Cell (203) 685-2228
Fx (203) 256-2727
1499 Post Road - PO Box 139
Suite 1040, 2nd Floor Rear
Fairfield, Connecticut 06824
Website: www.krscpasllp.com
Dear Gov. Malloy,

Thank you for your interest in reducing state government paperwork.

I recently closed my small business due to retirement. I have the following thoughts:

I had to file the following CT taxes each quarter, and some required a separate annual summary filing as well.

Annual Corporation Tax - Secretary of State
Quarterly Sales and Services Tax - Dept of Revenue Services
Quarterly payroll withholding for part-time secretary - not sure which dept
Quarterly withholding for unemployment tax - Department of Labor.

So many web sites, with different requirements, languages, rules, sign-on protocols and password protocols, payment regulations. etc.

Can't the state create a single, user-friendly, combined small-business web portal for the taxpayer to enter all business tax information; have consistent rules on how payments may be made; And have the flow of information sent internally by the system to each department through the back end of the website?

It's hard to make a living these days. I really didn't like burning up a couple of hours each quarter for a part-time business on state paperwork.

Best regards,

Peggie Cosgrove

Sent from my iPad

Peggie Ford Cosgrove
Chief financial officers in each agency report to the commissioners. They tend to rubber stamp the budget and spending decisions of the guy who does their performance reviews. Consider a dual reporting structure with dotted line to the commissioner and straight line reporting to OPM. Current structure is contrary to smart spending decisions and encourages the year end spending frenzy—spend it or lose it.

Bruce W Gardner box 369 Windham ct

I think that Sunday Hunting on private land needs to be allowed. I hunt to provide food for my family and some friends. The Sunday hunting ban in our day and age has been outgrown. I understand that it was implemented for day of worship but I am Jewish and my day of worship is Saturday and therefore it does not benefit me. Also the Government has allowed alcohol to be purchased on Sunday’s and holiday’s for monetary reason’s. Opening Sunday hunting will also give the state more money as hunters come into our state to hunt on Sunday. and by opening it to private land, it will not interfere with people who want to use the state park’s for recreation. So I feel that this law is outdated as you look across the country and see that almost all the state’s in our union have done away with this restriction. Studies have shown that this has had no detrimental affect on wildlife population’s. So Please consider changing this law.

Your announcement about red tape reduction

Governor, this sounds nice, but part of the state government is excluded; and those parts that do report to you have failed to report on prior similar announcements. So, this is more political theatre than reality. You tout small victories, but do not address major battle losses. You are on the Titanic playing the violin. I hope you truly wake up to reality and address basic problems. Young people are leaving the state; jobs are leaving the state faster than new ones are being created. Please try not to view the world through your liberal filters.

Pat Sullivan
860-210-9013

10/21/2013 5:05:00 PM
Dear Governor Malloy,

You speak as if you are interested in helping small business owners. Your words don’t follow your actions.

We own a small retail outlet that happens to sell cigarettes, as thousands of other families do. On July 1st 2013 you had signed into law a sales tax on “our cost” of cigarettes. It’s apparent that you never owned or operated a retail outlet that was subject to collecting sales tax for the State. The State’s reasoning for this was to help prevent fraud. This couldn’t be further from the truth. The State really wanted to collect 90% of the tax money earlier.

If the State wanted to prevent fraud, all they had to do was have all the “licensed” cigarette wholesaler’s provide for the State, a dollar amount that was sold to each “licensed” retailer as the Beverage Alcohol Industry did a number of years ago. Instead you impose a 6.35% sales tax on the cost of a product that could sit on our shelves for a number of month’s before they are sold. These early out of pocket dollars could have helped pay for other purchases.

You have to agree that this is not a very friendly way of doing business in the State of Ct. This should be repealed as quickly as it was signed into law. To the best of my knowledge this is the only product that has incurred such an injustice.

Hopefully you will address this issue.

Regards

Paul A Baudouin
120 Governor Trumbull Way F-4
Trumbull, Ct 06611

10/22/2013 11:26:00 AM
To Whom it May Concern,

I am writing in regards to the Governors request for opinions on regulations that are "obsolete, duplicative, excessively burdensome, or otherwise ineffective or unnecessary". In particular, the excessively burdensome State Admissions Tax of 10% which is applied to my business.

I am a small business owner of a Family Entertainment Center with a focus on Children's Birthday Parties. The name of my business is Fun Factor and the facility is located in Brookfield, CT. We provide indoor inflatable bounce houses for children to play on, along with a few arcade games. We advertise ourselves under the headings of "your Birthday Party Headquarters", Birthday Parties, etc. and are listed in magazines such as Ct. Parent Magazine under CT. Children's and Kids Birthday Parties, as well as with YP Advertising under Party Rentals, Party Planning. The birthday parties are structured so that the children get one hour of free play, along with a 1/2 hour in a party room for food, drink and cake. They are then permitted to go back out & play on the bounces, etc. for as long as they would like. Although walk-ins are allowed, the bulk of the business is from the birthday parties themselves. I am attaching a couple of documents to illustrate to you the make-up of the business derived.

Attached are the September 2013 Product and Category Accrual Sales Report, along with the September 2013 Event Stats by Month. As you will see, I have indicated on the Product and Category Accrual Sales Report, with a check mark, all items that I can definitively tie back to birthday parties for that month. Should individual invoices be required I would be happy to provide them. Even the shipping & handling is tied to the parties as it is the amount charged to mail out a party packet. The Event Stats by Month provides a breakdown on the four party packages we offer, as well as two camp sessions. The Camp Sessions are typically field trips from schools, park & recreations, etc. with breakouts being based on the number of attendees. Both reports clearly show the bulk of the business coming from the parties we host. The amount of the Admissions tax I was
required to pay for September 2013 was $1628.00; if you look at the totals indicated on page 2 of the Product & Category Sales Report I think you will see how excessively burdensome the admissions tax is to a facility such as mine. We are not a large amusement center but a small Mom & Pop shop offering entertainment to kids.

Although we do allow walk-ins to come in to the facility, as I mentioned, it is not the bulk of the business and I am requesting a review be done as to why a facility with the prime focus of Birthday Parties is required to apply the Admissions Charge to patrons when facilities such as laser tag or miniature golf are not. The Exemptions from the Admissions Tax, IP 2008 (11), states daily or hourly fee’s for organizations such as these are exempt, along with batting cages, golf cages, golf ranges or daily greens fees, ice or roller skating rings, tennis or racquetball courts. Also that daily charges entitling patron(s) to participate in an athletic or sporting activity are exempt. We have an obstacle course, a sport bounce, slide, large inflatable basketball hoop, all which can fall under this category.

I am respectfully requesting that this tax be looked at as it applies to my business.

Thank you,

Amy Farley
Owner, Fun Factor Brookfield
www.FunFactorBF.com
Burdensome State Regulations which "Harm" Connecticut businesses?

Here is my list:
1. Time off paid by business for a child (baby) only State in country.
2. Sick leave paid by business, only State in the country.
3. Energy cost highest in the country 16% tax on wholesale fuel.
4. State dept highest in the country by population. Effects the credit rate offered to businesses.
5. State income tax on social security and pension benefits. Why? 36 States do not have this burden.
6. State inheritance tax is up by 7.2% this year. Sunset this law now.
7. Local property tax is unreasonable when compared to other States in USA, regionalize fire, police, road services by County. End / reduce or change all of the above and give a Connecticut business a chance to survive.

Best Regards,
Eric Erickson
To Whom It May Concern:

Please consider some Ct. State Sales Tax Revisions for the following groups of private citizens:

Specifically:
1) For home schooling families who pay taxes but do not send their children to school. Please consider exemptions for curriculum purchases for them, both in state and out of state. This can add up to a considerable amount of money, and they are essentially paying a "double" tax for schooling for their children, as their children do not attend public school.

2) For people who are sick and need supplements. Many people are disabled with undiagnosed and, therefore, untreatable via the regular medical establishment, pain. The only things that may help them are vitamins and supplements. Prior to a few years ago, these were never taxed. Please consider taking them off the sales tax list again. For people who spend hundreds of dollars a month on necessary supplements, the amount of money paid in 6.35% sales tax can be astounding and is a big burden, especially if they cannot work.

Thank you for considering this.

Respectfully,

Irene Pahlsson
42 Newton Road
Branford, CT 06405

| 10/17/2013 3:46:00 PM |  |
Dear Michael:

I saw the e-mail you sent me about "Sick of State Government's Red Tape?" and it actually made me laugh, but for very good reason and this should make all of you laugh too. Apparently Commerce Security Services our company has unpaid back state sales and use tax for a month in 2010, I suspect it occurred when Lynn had her bad car accident and six days later I ended up having a heart attack. It's not a lot of money by any means. This is what I got from the DRS "If your contracts and services normally averaged $X,500, remit the tax of $390 plus 25% interest of $97.50. Although Amnesty runs to Nov 15, we will not renew your sales tax permit which expires on Sep 30. Go to www.makeitrightCT.com to research options via Amnesty.".

Now the state needs money right? well here is the problem and issue I do not put personal or business things that are confidential on this computer. The computer is not 128 bit encrypted, and has been infected with viruses and trojans before to the point I have had to wipe it and re-install windows. Yet the state directs me to websites all the time, they tried this nonsense with paying our monthly state sales and use taxes too, I REFUSE to do it as I know my computer is not secure. So we pay them by phone as it's more secure in relating to our financial matters.

So I am sitting here this month with a postal money order in the amount for $487.50, a willingness to send the money in and no way to do it, go figure. Why cant I just submit a sales and tax use form for that period and enclose the check and mail it to the DRS? back taxes paid and the state gets money, everyone is happy and one less matter to be bothered with... No of course not as they have computers on the brain lol and it would be far to easy and simple to do as I suggest...

Not everyone has an encrypted computer you know, and most computers are infected with something, spyware, trojans, viruses, key stroke loggers, and more. So why would anyone depend so heavily on them other than less paperwork which I am sure is eventually printed out anyways for record keeping.
Can I send you or DebraLee the form and money order and you can figure it out for us lol, we have our hands full with running our small business and a lawsuit over Lynn’s car accident. I will also be forwarding you some suggested legislative changes in the near future and we would appreciate it if you look it over as it could prevent someone from being hurt or killed needlessly.

David & Lynn Marchetti
Commerce Security Services, LLC.
P.O. Box 609
Newtown, Connecticut 06470
203-797-8626

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Useless laws

1 - seat belt law - it’s up to the adult whether they want to wear there seat belt. There life is at risk no one else’s
2 - gun law - why should law abiding citizens should be punished. The main problem is the mental unstable people.

Sent from my iPhone

10/19/2013
8:54:00 AM
I would appreciate a response to the following from someone who is responsible and accountable for the outrageous cost of State Government. Connecticut is among the highest tax states - income, real estate, sales etc. Only those who own business or have jobs in CT or work in NY have reason to reside in Fairfield County. Those who can work from anywhere or who are retired are leaving for areas where all housing, living expenses and taxes are lower and there is no income state income tax. In large measure the exorbitant costs in CT are related to collection and spending of taxes on income, sales, estate and real estate as well as the enforcement of regulations. Where is the representation of we the people to clean house and eliminate taxes and the costs related to their collection and wasteful spending? Apparently the majority of the legislature benefit by higher taxes while we the people are poorer as a result. Our daughter and her husband and two adult grand children have left the State as well as several of our retired friends. Corporations are also leaving. Isn't this a wake up call??

--
Tom Watson
4 Sharp Hill Lane
Ridgefield, CT 06877
Office 203-894-4649
Cell 203-417-3600
To whom it may concern,

There is a statute on the books (According to Judy Pearl at Secretary of State’s Office) that says they must keep a UCC1 filing against a company for 5 years after it has been satisfied and the lender has paid the $50. To terminate it. This causes a lot of problems when we go for financing or just general bank review (which they do on a yearly basis now). This is not right! It’s no different than after you pay off your mortgage and then have to wait 5 years to get a clear deed. What can we do about it?

Gary R. Bergeron, President
Connecticut Trailers, Inc
7 Bolton Center Rd
Bolton, CT 06043-7226

860-649-7223 x11 ~GSA Contract # GS-30F-0014V
800-597-9440 x11 ~DAS Contract# 10PSX0307
860-645-8755- Fax ~Dunns# 796365240
www.cttrailers.com ~CAGE Code 4QCH6

Bravo-BigTex-Bri.Mar-CM Trailers & Truck Bodies-Featherlite-Haulmark-Mission, Aluminum-Sundowner-Wells Cargo-Worthington, Blizzard Snow Plows & Sanders. We are behind you all the way!!

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FW: Message from KMBT_C452

Regulation strangulation. See attached. Actions belie words.
Please remove this law

Please remove the ban on wine sales in Supermarkets that sell beer. I have been in several states where I can buy WINE AND beer in the supermarket. This rule is discriminatory against the wine drinkers of Connecticut.

Also, the State needs to get out of the business of price fixing alcohol and limiting which brands can be sold in Connecticut. This is hardly what I call free enterprise!

Thank You,
John A. Deer
203 Fieldstone Terrace
Naugatuck, CT 06770

10/22/2013 8:57:00 AM
Gentlemen:

I refer to the conflicting powers - and regulations of the DEEP regarding the watercourse of Candlewood Lake. Some of the regulations and purported powers of the DEEP conflict with the CT supreme court decisions and, therefore, should be changed to reflect the court's decision.

CT statute: chapter 268, sec. 15-127 claims powers of the commissioner include "state waters" ..."excepting federal waters." Yet in the adjudicated supreme court case: Hackett v. J.L.G. properties, 2008 (#17871), federal authority of the lake (license P-2576 to First Light Power) supersedes local zoning. Cases reviewed cited in this decision concluded that the state has little, if any, authority in regulating Candlewood since this appears to be exclusively the purview of the federal government through the Federal Energy Regulatory Commission as determined by Congress. Since local Zoning Commissions are considered a legal entity within CT and not even subject to the electors through the town meeting form of government (a unique situation differing from all other New England states' laws), it would follow that the state would also lack the legal power it has assumed up to the time of this decision by our court.

There are a number of ramifications that I would like to discuss further concerning a number of regulations within this department which also conflict with property rights, if you have the inclination and time to respond. Otherwise, thank you for this opportunity to bring this conflict to your attention.
Bob Stryker (203) 746-6363, or via email.
There are numerous regulations and laws hindering or harming the state of Connecticut and our citizens. These should be eliminated or changed. Thank you for giving me the opportunity to recommend several absolutely necessary changes to be competitive as a state and protect citizens.

1) ALL unfunded mandates should be eliminated. If the state cannot find the money to fund them don't raise my property taxes to do so.

2) Stop all taxpayer funded "cleanup" of contaminated sites. If land is not used for some new purpose the land would be "dirty" forever, might better be using it in the meantime.

3) All laws should have sundown provision. Need review as time passes. At least every 10 years.

4) Get rid of "retention" bonuses. Holdover from when state employees had lots of benefits and low pay. Now they have excessive benefits and excessive pay. Sure don't need additional pay. Public pay/benefits should "mirror" similar, average, in private industry instead of being "negotiated".

5) Privatize all services except police and courts. Particularly schools, DMV, Social Services, DPW, DEEP, Accounting/payroll.

6) Require cell phone suppliers to "shut down" cell phone services, except for 911, when GPS function indicates phone is moving more than 5 MPH unless it is on a rail line.

7) Implement law to encourage gun production in this state, keep the few manufacturers we still have and actively seek new ones. Enforce and strengthen laws locking up illegal possession. Encourage use by "honest" citizens.

8) Enforce all new laws vigorously before adding new ones.

9) Continue with "free" unemployment money for the first month. Gradually, over about two months, change unemployment payments to a zero interest loan. Encourage people to quickly get off unemployment. Allow them to pick a
smaller payment than the "standard" amount so they would be able to receive needed funds but limit the loan amount they would have to pay back. This needs a great deal of work and comment. If it ever comes up I would have much more to suggest needed before implementation. There needs to be a way people could work part time and not "loose".

10) Stop the costly and unnecessary labeling of genetically modified foods. Have used hybrid crops for years, safe GMO's!

11) Stop using "other people's" tax money to help a few buy things that many (including me) cannot afford. Stop paying for part of someone's new hybrid car for instance, or their solar panel heat and electric. Why should those that cannot afford these pay for those that can already afford them. In my case I have not been able to afford a new car in 20 years but have had to help pay for those that can. Same applies to many people in this state.

12) Have a citizens committee "watchdog" oversee the awarding of all state and municipal contracts to keep politics out of awarding them.

13) Have a cost/benefit analysis prepared and provided to the citizens before enacting legislation. Review that in a year and require a re-vote if the results are more than 10% different than what was presented to the citizens and "voted on".

14) Revise (mostly lower) tax rates to be conducive for inviting business (particularly manufacturing) to re-locate into Connecticut. More new business would eventually result in more taxes! In the meantime please limit spending to match income. To accomplish this please create an "industrial engineering" position with the absolute authority to make cost saving changes in all state functions.

Thank you for your help.

William Fuller
<table>
<thead>
<tr>
<th>Name</th>
<th>Town</th>
<th>Department</th>
<th>Issue</th>
<th>Notes</th>
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<tr>
<td>Joseph J Camarra</td>
<td>Oxford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Paul Anderson</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>handguns in State Forests/Parks</td>
<td></td>
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<td>Ken Bavier</td>
<td>Manchester</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>WE should be able to carry our personal protection in state forests and parks.</td>
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<td>Brian White</td>
<td>Southbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forests</td>
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<td>Christopher Rubbicco</td>
<td>Sterling</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/31/2013 6:11:10 PM</td>
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<td>Robert Sherwill</td>
<td>Southington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/31/2013 6:36:50 PM</td>
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Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

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<td>South Windsor</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/31/2013 8:29:22 PM</td>
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<td>Miguel Torres Jr</td>
<td>Waterbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/31/2013 8:46:29 PM</td>
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<td>Dan Whitney</td>
<td>Meriden</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>10/31/2013 8:48:36 PM</td>
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Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.
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<td>Jeffrey Wild</td>
<td>Naugatuck</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carrying handguns in state forest</td>
<td>10/31/2013 9:45:56 PM</td>
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| Richard Pianko | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<p>| Richard Phelan | East haven                       | Energy and Environmental Protection, Dept Of | Carrying handguns in state forest                        | 11/1/2013 7:44:18 AM |</p>
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| Steven Patterson | New Fairfield | Energy and Environmental Protection, Dept Of Education | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Jose F. Garcia Jr. | Bristol | Energy and Environmental Protection, Dept Of Education | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Ronald Iannucci Jr | Naugatuck | Energy and Environmental Protection, Dept Of Education | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Robert Wood     | Milford   | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/1/2013 1:03:44 PM                                                                 |                  |
| James Laviana   | Waterbury | Energy and Environmental Protection, Dept Of | Please modify State Agencies Regulations to allow with valid Permits to Carry Pistols and revolvers to carry for self defense while in Connecticut State Parks and Forests. Specifically:  
- Remove the prohibition on "carrying of firearms" in Section 23-4-1(c) of the Connecticut Agencies Regulation  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self protection. | 11/1/2013 1:03:58 PM                                                                 |                  |
| John Meany      | Granby    | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Jeffrey R. May</td>
<td>East Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Shawn Rigoulot Sr.</td>
<td>New Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Thomas (Tony) Hayes</td>
<td>Wallingford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State Parks</td>
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<td>Bob Harley</td>
<td>Haddam</td>
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<td>kenneth silliman</td>
<td>New Fairfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns state parks</td>
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<td>Tom Cassin</td>
<td>Newtown</td>
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| William P. Brinn | Washington | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/1/2013 7:12:29 PM |
| John Martello | Michael | Stamford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests/Parks | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Rodney Devoe | Southington | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Peter Bova, Jr.</td>
<td>Northford</td>
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<td>Rita M. Bova</td>
<td>Northford</td>
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<td>Richard Norbut</td>
<td>Bristol</td>
<td>Energy and Environmental Protection, Dept Of</td>
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| Jack Korduner  | Norwich       | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| John McCormack | Moodus        | Energy and Environmental Protection, Dept Of| handguns in State Forests/Parks                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers so we can carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/2/2013 9:28:19 AM  |
| John Milardo   | Middletown    | Energy and Environmental Protection, Dept Of| Carry handguns in State forest-park             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers so we can carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/2/2013 8:55:34 AM  |
| Steven Vyce | Madison | Energy and Environmental Protection, Dept Of | Right to carry handguns in state ps | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Of all places, remote state parks and forests would be a prime area for necessity of self defense. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |

| Donald A. DiAnge | Windham | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| George Kochera III   | Waterbury          | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Robert Martineau     | Ledyard            | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| F. David Laun        | Granby             | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Energy and Environmental Protection, Dept Of</td>
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<td>Jeff Pechmann</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Francis P Wells Jr</td>
<td>Plainville</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Enfield</td>
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<td>Kurt Asplund</td>
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<td>Carrying handguns in State Forests</td>
<td>11/3/2013 12:16:02 PM</td>
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<tr>
<td>Ann</td>
<td>East Hartford</td>
<td>Firearms Permit Examiners, Board Of Personal Freedoms</td>
<td>I feel that Gov. Malloy has not fully investigated this matter of the issues of Firearms. Our rights have been in place long before violence with weapons became a problem. This needs to be dealt with by the Authorities and leave the citizens who are responsible alone.</td>
<td>11/3/2013 1:30:20 PM</td>
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<td>Dennis Michaud</td>
<td>East Hartford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>To carry s pistol in a State forest</td>
<td>11/3/2013 1:37:22 PM</td>
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<td>You are stepping on my 2nd Amendment rights, no one has that right.</td>
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| Scott Neurath | Barkhamsted    | Energy and Environmental Protection, Dept Of | Carrying hand guns in state forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Request</th>
<th>Date and Time</th>
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<tbody>
<tr>
<td>Kurt L. Schutz</td>
<td>Orange</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>handguns in State Forests/Parks</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations; - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>11/3/2013 3:45:16 PM</td>
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<tr>
<td>Joseph Swetcky, Jr.</td>
<td>Bloomfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State Forests and Parks</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in certain CT State Parks and in all CT State Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(C) of the Connecticut Agencies Regulations; - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers for the purpose of self-defense. Thank you.</td>
<td>11/3/2013 5:49:33 PM</td>
</tr>
<tr>
<td>Marten Provenzano</td>
<td>Stratford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations; - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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</tr>
<tr>
<td>Daniel Troiano</td>
<td>Cheshire</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>handguns in State Forests/Parks</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>11/4/2013 1:51:58 AM</td>
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<tr>
<td>Patrick Lloyd</td>
<td>Stonington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>11/4/2013 8:29:32 AM</td>
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</tr>
<tr>
<td>JERRY L. WALTON</td>
<td>Pawcatuck</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>11/4/2013 9:03:51 AM</td>
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<tr>
<td>Name</td>
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</table>
| Jason Roberts   | Torrington | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Jason Deguzis   | Naugatuck | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Bryan Lazerow   | Naugatuck | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tbody>
<tr>
<td>Gordon Snyder MD</td>
<td>West Hartford</td>
<td>Emergency Services and Public Protection, Dept Of</td>
<td>Carry handguns in state parks</td>
<td>23.4.1(c), 26.66.2 please make it legal for pistol permit holders to carry handguns in state parks etc</td>
<td>11/4/2013 4:36:32 PM</td>
</tr>
<tr>
<td>David S. Reynolds</td>
<td>Marlborough</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>11/4/2013 5:26:41 PM</td>
</tr>
<tr>
<td>Richard Schwab</td>
<td>North Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Jason Magnuson</td>
<td>Willimantic</td>
<td>Energy and Environmental Protection</td>
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<tr>
<td>norman sholtis</td>
<td>barkhamsted</td>
<td>Energy and Environmental Protection</td>
<td>Carrying handguns in state forests</td>
<td>23-4-1 c –26-66-2</td>
<td>Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Rebecca Cronin</td>
<td>Windham</td>
<td>Energy and Environmental Protection</td>
<td>Handguns in State Forests/Parks</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations – Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
</tr>
<tr>
<td>Name: Channing L Poirier</td>
<td>Position: Energy and Environmental Protection, Dept Of Firearms in State Parks</td>
<td>Reason: Dear Governor Malloy:</td>
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<td>23-4-1(c) and 26-66-2</td>
<td>At a sportsman outing I recently was made aware of the state's consideration of allowing pistol permittee's to travel in and through state parks while carrying a weapon.</td>
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<td>Frankly, I never knew that carrying a concealed weapon by a permit holder was illegal in a state park, and my guess is most permit holders are also unaware of this prohibition.</td>
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<td>I am asking you to support any legislation that would overturn this ban, allowing permit holders to carry in and through parks, as they would most any other location legally if they choose to do so (obviously govt buildings and airports/schools excluded.)</td>
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<td>Thank you for considering my concerns.</td>
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<td>Kind Regards,</td>
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<td></td>
<td></td>
<td>Channing L Poirier</td>
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<td></td>
<td>East Lyme</td>
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<thead>
<tr>
<th>Name: Anthony L. Cavallaro Jr.</th>
<th>Position: Guilford Sportsmen's Association</th>
<th>Reason: Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</th>
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<td>23-4-1(c) and 26-66-2</td>
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<tr>
<td>LeRoy Kidd</td>
<td>New Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits</td>
<td>11/5/2013 3:47:47 AM</td>
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<td></td>
<td></td>
<td>Carrying handguns in State Forests</td>
<td>to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</td>
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</tr>
<tr>
<td>Timothy Sabrowski</td>
<td>Canterbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits</td>
<td>11/5/2013 7:21:39 AM</td>
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<tr>
<td>Peter Schoppenhau</td>
<td>Wolcott</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits</td>
<td>11/5/2013 8:02:17 AM</td>
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<td>Jr.</td>
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**What difference does it make?**

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.
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| Daniel Desjardin      | Manchester      | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | 23-4-1(c) & 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| James Bicknell        | Stafford Springs | Energy and Environmental Protection, Dept Of | Handguns in State Forests/Parks           | 23-4-1(c) & 26-66-2 | Please modify the Agencies Regulations to allow individuals with valid Permits to carry pistols and revolvers to carry for self defense while in CT. state parks and forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in section 23-4-1[c] of the Connecticut Agencies Regulations.  
- Add an exemption to allow the carrying of pistols and revolvers [including handguns using center-fire ammunition] for the purposes of self defense. |
| William M Ducci       | New Hartford    | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forests        | 23-4-1(c) & 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>bryan vasconcelos</td>
<td>South Windham</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Karl Dale</td>
<td>Trumbull</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<td>Dan Sullivan</td>
<td>Ellington</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Organization</td>
<td>Role</td>
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<td>Time</td>
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<tr>
<td>Gary Roman</td>
<td>Suffield</td>
<td>Healthcare Advocate, Office Of The Health Care Insurance</td>
<td>Please advise as to why small businesses, other than the State, cannot apply for health insurance as an association. My company is seeing a 20% increase in costs, leading to difficult business decisions about staffing and keeping staff employed as only part-time employees. The associations with other employers would tend to spread risk and possibly lower premiums.</td>
<td>11/5/2013 1:54:30 PM</td>
</tr>
<tr>
<td>Ozlem Camli</td>
<td>Wethersfield</td>
<td>Education, Dept Of Kindergarten start age</td>
<td>Presently, children may enter Kindergarten before they have turned 5 years of age. The cut off date is turning 5 by December 31 of the year they start school. This is much later than other states around us. This is making it really difficult for children with late birthdays, especially boys. This regulation has come up in the legislation but there has not been a change yet. This practice is a hardship on children who are not socially and emotionally ready to start public school and meet the demands of a structured classroom. These young children are not ready to focus and stay on task and sustain their work as needed. They struggle and fall behind, and may never quite catch up with their peers. Research also supports that children who are pushed to do academics too early struggle and have further difficulty in their school years. It is in the best interest of the young children of CT to reconsider this cut off date.</td>
<td>11/5/2013 6:20:44 PM</td>
</tr>
<tr>
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<td>Issue Description</td>
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<td>Don Schuler</td>
<td>Bristol</td>
<td>Energy and Environmental Protection, Dept Of</td>
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</tr>
<tr>
<td>Jeffrey S. Owens</td>
<td>waterbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in CT forest, park Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Sandy Bugai</td>
<td>Rockfall</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>11/5/2013 8:35:12 PM</td>
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<tr>
<td>GERARD NAPOLI</td>
<td>Manchester</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<tr>
<td>William</td>
<td>Northford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>handguns in State Forests/Parks</td>
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</tr>
<tr>
<td>Chanel</td>
<td>For sale</td>
<td>Chanel Handbags for sale for sale</td>
<td>Chanel Handbags for sale Clutches are a type of purses which are mostly used in evening parties or any dressy events.</td>
<td></td>
</tr>
<tr>
<td>Francis Bucettas</td>
<td>Canterbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forests</td>
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.
| Scott Rossignol | Enfield | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |

| Kenneth Baker | Granby | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | In the state of Connecticut, it is extremely hard, costly and time consuming to obtain a carry permit. I am seventy-five, and having lived in Connecticut for over forty-five years without ANY blemish on ANY database ANYWHERE, it took me four months to obtain my permit. Responsible gun owners are not the problem. It is the fault of plea-bargaining and/or failure to rigidly enforce existing gun laws already on the books. Even our existing regulations regarding OPEN CARRY, and IN HOME self-protection are confusing and sometimes contradictory. Common sense tells me that even though I can carry a weapon into a crowded mall where my chances of being assaulted are next to zero, I cant carry a weapon in a state park or forest where an ambush or assault is far more likely to occur. I realize that there are places where weapons, especially exposed ones, cannot be allowed. But when was the last time that you heard of a crazed gunman in an sparsely Populated state park?

Please change the regulations, and clarify others to permit responsible gun owners to CARRY (even open-carry) in areas where they might feel threatened. Believe me; most of us would rather flee than kill a person or wildlife. |
<table>
<thead>
<tr>
<th>Randy Daggett</th>
<th>K.B. Ambulance Corps</th>
<th>Killingly</th>
<th>Motor Vehicles Department</th>
<th>ambulance inspections</th>
</tr>
</thead>
</table>

In regards to DMV ambulance inspection when purchasing a new ambulance:

step 1 stand in line to pay the $20 fee for the inspection, in my case 45 minutes.
step 2 ambulance inspection only 10 minute wait by DMV inspector
step 3 return to DMV line to transfer plates to the new ambulance, one hour wait.

Conclusion: the inspection fee should be built into the transfer fee so we only have to wait in line once, furthermore many aspects of the DMV inspection and the OEMS INSPECTIONS ARE THE SAME, Please help
<p>| Kenneth Baker | Granby Firearms Permit Examiners, Board Of | conceal /open carry regulations | In the state of Connecticut, it is extremely hard, costly and time consuming to obtain a carry permit. I am seventy-five, and having lived in Connecticut for over fifty-five years without ANY blemish on ANY database ANYWHERE, it took me four months to obtain my permit. Responsible gun owners are not the problem. It is the fault of plea-bargaining and/or failure to rigidly enforce existing gun laws already on the books. Even our existing regulations regarding OPEN CARRY, and IN HOME self-protection are confusing and sometimes contradictory. Common sense tells me that even though I can carry a concealed weapon into a crowded mall where my chances of being assaulted are next to zero, I cant carry a weapon in a state park or forest where an ambush or assault is far more likely to occur. I realize that there are places where weapons, especially exposed ones, cannot be allowed. But when was the last time that you heard of a crazed gunman in an sparsely Populated state park? Revisit Sandy Hook for example. It was certainly a tragedy. But despite the stringiest near lockdown conditions, a determined madman still couldn’t have prevented the killing of those children with an assault weapon. I have been to our (Granby) middle/high school complex when school is starting or ending to pick up one of my grandchildren. There are numerous LOADED school busses and PRIVATE vehicles picking up students. There is no way to prevent that madman from getting out of his car and spraying the entire scene with gunfire. Get assault weapons and high capacity magazines off the streets, RIGIDLY enforce existing gun laws, and allow RESPONSIBLE gun owners to be able to open or conceal carry hand guns at their descretion where not specifically forbidden. |
| --- | --- | --- | 11/6/2013 9:40:32 AM |</p>
<table>
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<tr>
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<th>Reason</th>
<th>Suggestion</th>
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</table>
| Robert Makowski     | Watertown  | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/6/2013 11:19:47 AM |
| James Branson       | Brookfield | Energy and Environmental Protection, Dept Of | Carry Handguns in state forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/6/2013 11:36:46 AM |
| Tristan Wilson      | Southington| Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/6/2013 12:11:38 PM |
| Craig Pernerewski   | Southington| I don't know                      | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Request Details</th>
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| B Cannon      | Manchester   | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/6/2013 2:24:14 PM |
| Gummoe        | Vernon, CT   | Energy and Environmental Protection, Dept Of | I would please ask you modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
-- I would propose to remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
-- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/6/2013 2:38:26 PM |
| Cory Cepelak  | Cromwell     | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>Lorry Champagne</td>
<td>Stafford Springs</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to carry Pistols and Revolvers to carry a handgun for self defense while in CT state parks and forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1[c] of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Michael McCue</td>
<td>Windsor</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>David Stroberg</td>
<td>Ridgefield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Chris Zabka | south windsor | I don't know | The Right To Carry in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| 11/6/2013 6:55:47 PM |

| Tim Rockefeller | North Branford | Energy and Environmental Protection, Dept Of | carrying handguns in state parks | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  

I carried a rifle overseas and I am more than qualified to be safe with it in the woods for personal protection. |
<p>| 11/6/2013 7:19:06 PM |</p>
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<th>Name</th>
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<td>David Chapdelaine</td>
<td>North Grosvenordale Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forest 23-4-1(C) &amp; 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Michelle Chapdelaine</td>
<td>North Grosvenordale Energy and Environmental Protection, Dept Of</td>
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<th>Section(s)</th>
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| John M. Joy          | Oxford        | Energy and Environmental Protection, Dept Of| Handguns in State Parks & Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. I am a frequent user of the state's parks and forests - they are wonderful resources. I also have a pistol permit. That I cannot legally carry there makes absolutely no sense - especially since the attractive feature of many of DEEP's resources are their remoteness. I would never think of going there without a first aid kit; why not the means to defend myself? |
| William G. Pringle, Jr. | Manchester    | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Silvio Bandeira      | Salem         | Energy and Environmental Protection, Dept Of| Handguns in state forest / parks | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>Elijah Mitchell</td>
<td>New London</td>
<td>Energy and Environmental Protection, Dept Of Parks</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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Hello. I am writing to recommend a change in regulations 23-4-1(c) and 26-66-2.

CARRYING HANDGUNS IN STATE PARKS OR FORESTS

"According to DEP, a person may legally possess a handgun in a state park or forest when carrying the handgun EXCLUSIVELY FOR HUNTING SMALL GAME (e.g., rabbits, squirrels) or other authorized activities, such as for use at a firearms range or participation in a hunter education class. They may only do so at predetermined times in areas set aside by the DEP commissioner and posted for such purposes (Conn. Agencies Regs. § 26-66-2(d)). DEP says that what is permissible for hunters depends on the site and season."

and

"Under DEP regulations, a person cannot use a handgun using centerfire ammunition to hunt on state-owned land. Handguns using ammunition larger than .22 caliber rimfire long rifle cartridges also are prohibited on state-owned land (Conn. Agencies Regs. § 26-66-2(a))."

I feel that if a person has been through the background checks required to obtain a Concealed Carry Permit which as most know allows a person to carry a handgun in public they should also be allowed to carry a handgun of any caliber when in state parks and forests for self-defense year round.

Many of the trails on these parks and forests can go several miles away from civilization. These locations often have little to no cell phone reception. Should a person encounter a dangerous animal or person there may be no way for a person to call for help. If there is cell phone coverage it can be quite difficult to describe the specific location of the encounter to authorities therefore dramatically increasing the amount of time it will take authorities to respond to the scene. If a person was to encounter an aggressive animal or person they currently have little means of protecting themselves. Simply the loud noise of a firearm may be enough to scare away a dangerous animal. Actually shooting the threat may not even be necessary, after
which the proper authorities could be notified of the event.

If the encounter was caused by a dangerous animal it may be rabid and a search for the animal as well as issuing an alert would seem prudent. If the event was caused by a person the situation would undoubtedly warrant police intervention. This is no different than if one had to draw their handgun in any other part of the state.

In closing it would not be unreasonable to change this regulation making carrying concealed handguns of any caliber for self defense purposes in state parks and forests legal provided the person has a valid ct state permit to carry pistols and revolvers.

Thank you for your time and your consideration in changing these regulations. I am confident that you can understand my concerns in this matter.

David T Rouleau
<table>
<thead>
<tr>
<th>Name</th>
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<td>Michael Tolpa</td>
<td>Simsbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<tr>
<td>Mike Guastaferri</td>
<td>Prospect</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Joe Bemonte</td>
<td>Oakville</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Armando Gonzalez   | Hartford      | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | 23-4-1(c) and 26-66-2  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| David Dunn         | Stonington    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | 23-4-1(c) and 26-66-2  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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Thank you  
David Dunn  
Stonington, CT | 11/7/2013 7:17:12 PM |
| Christopher DeJitko| West Haven    | Energy and Environmental Protection, Dept Of | handguns in State Forests/Parks           | 23-4-1(c) and 26-66-2  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>Domenico Cassano</td>
<td>New Fairfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State forests</td>
<td>23-4-1(c) and 26-66-2</td>
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<td>Denise Cassano</td>
<td>New Fairfield</td>
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<tr>
<td>Jeffrey S. Owens</td>
<td>Waterbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in CT forest,park</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Timothy Burby         | Bristol      | Energy and Environmental Protection, Dept Of | Carrying hand guns in state parks a | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                                                                   | 11/8/2013 6:56:28 AM |
| Michael Conway        | Torrington   | Energy and Environmental Protection, Dept Of | carrying handguns in state forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                                                                   | 11/8/2013 7:01:14 AM |
| Dennis P. Kisyk Sr.   | Naugatuck    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tbody>
<tr>
<td>Kelly Rogers</td>
<td>Meriden</td>
<td>Energy and Environmental Protection, Dept Of Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
<td>as a legal permit holder I feel that I should be able to carry anywhere because whose to say that a bad guy isn’t in the same area and decides to commit a act of life threatening violence I could prevent the situation and save my life and others after all that’s what I went thru training for and spent all this money for to become a legal gun owner plus I'm a security officer so I know something about hostile situations. thank you for listening Kelly</td>
</tr>
<tr>
<td>Michael Anderson</td>
<td>Burlington</td>
<td>Energy and Environmental Protection, Dept Of Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow citizens with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Elizabeth Mais</td>
<td>Prospect</td>
<td>Energy and Environmental Protection, Dept Of Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Bruno Ceniccola</td>
<td>Branford</td>
<td>Energy and Environmental Protection, Dept Of Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
<td>stop attacking the law bidden citizen...</td>
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11/8/2013 7:37:41 AM

11/8/2013 7:47:43 AM

11/8/2013 7:48:07 AM

11/8/2013 8:16:01 AM
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<td>23-4-1(c) and 26-66-2</td>
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|             |            |                                               | In the world we live in it would be foolish to be in an isolated area with out personal protection from human, animal, or unknown threats to personal safety. As I am handicapped my protection options for myself and family are limited. Responsible and permitted gun owners should not be forced to be defenseless to enjoy the beauty nature has to offer. Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |                |
|             |            |                                               | 23-4-1(c) and 26-66-2                                                             |                |
|             |            |                                               | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |                |
Attached is an article I wrote for the latest edition of "The Environmentalist" (cteha.org) which explains my position:

WHY CT NEEDS TO ADOPT THE FDA MODEL FOOD CODE
Jessica Fletcher, CEHA Technical Advisory Committee on Food Safety

OK, I’m saying it…acknowledging the elephant in the room: I think CT should adopt the FDA Model Food Code. I’ve chaired the CEHA food committee for two years now and while doing so, searched for a reasonable purpose and maybe a goal for this committee while attempting to navigate the delicate balance between CT DPH, local health, tribal sovereignty, and DCP.

While I don’t mean to offend the food safety committee members, to be quite honest, often when I reach out for ideas, opinions or help, I get little or no response. This apathy demonstrates the feelings of many health departments about restaurant inspections here in CT. It might be understandable, knowing how much there is to do in a local health department: supervising septic installations, issuing well permits, monitoring salons, pools, beaches… When it comes to the food safety program, it’s the same routine year after year, trying to keep up inspection numbers, deal with complaints, train new inspectors and worry about accumulating enough CEU’s. It’s frustrating! Food inspections often must take a back seat to more pressing business. Some health departments place the blame for this frustration on the FPP, but I think it’s time to realize that some of it might be due to CT’s outdated food safety regulations.

Why should CT adopt the FDA Model Food Code? Well, to date, New Hampshire, Vermont, and Rhode Island meet Standard 1 of the Voluntary National Retail Food Regulatory Program Standards. This means their food safety regulations are equivalent to the Food Code. In fact, New Hampshire just adopted the 2009 Food Code in its entirety. Maine and Massachusetts are very close and currently striving to meet standard 1 as well. What about Connecticut? While the CT DPH has used the Food Code in the past as a reference and resource for issues not included in 19-13-B-42, B-42 does not meet standard 1 and is not equivalent to the Food Code. In fact, our CT food safety regulations still lack information on Reduced
Oxygen Packaging (ROP), which is currently occurring in food service establishments throughout CT. Calling ROP, which includes cook chill, sous vide and vacuum packaging, a “cooling method” seems to be a way of avoiding a potentially serious food safety concern. It is also confusing to national restaurant chains that operate in multiple states. Here are some additional reasons to consider complete adoption of the Food Code:
• Consistency- The best way to promote consistency in food safety programs in the US is to get everyone using the same code to regulate retail food operations. The Food Code is widely used in many states, local and tribal jurisdictions. ANSI accredited training programs, including ServSafe, use the Food Code as the basis of their training.
• More Partners- Adopting the Food Code connects CT with a network of professionals and similar programs across the country with which we can share concerns, exchange information about what works, and receive support.
• Input and Involvement- The Food Code is updated and modified every two years based on recommendations made by a nonprofit organization established in 1971 called “The Conference for Food Protection”. This consortium of regulatory, industry, academia and consumer professionals reviews, discusses and debates food safety issues, both current and emerging, resulting in a system where every constituent has the opportunity to voice an opinion and make a contribution. Collaborating in this process allows participants to share in the shaping of food safety regulations through the process of issue submission, council debate, committee work, and voting by state delegates.
• User-Friendly- There’s no doubt about it- the Food Code is easy to use because the chapters are arranged in order of importance: high risk -> low risk. It’s easy to look things up if you can identify the violation.
• Annexes- In addition, the Food Code comes with an annex which gives background information on enforcement, references, administrative guidelines, management practices, criteria for food processing (ROP), and model forms, including a model inspection form for food establishments that is widely used by health departments and companies that design digital inspection systems.
Up-to-Date- Most importantly, the Food Code is updated every two years with the latest scientific information available at the biennial meeting of the Conference for Food Protection. The CT DPH is currently soliciting volunteers to reconvene a food safety advisory committee that will include representatives from state and local regulators, academia, industry and consumers. The last time this committee met regularly starting in 2005 through 2009, 19-13-B-42 was edited with new language and updates. None of these changes were ever realized, so the time and effort spent by this committee was wasted. Maybe this is the time to consider a different course of action. Instead of attempting to re-invent the wheel, why not convene this committee and give them a new charge: adopt the new 2013 FDA Model Food Code. Why not join the other states and jurisdictions that are working toward national uniformity of our food safety programs? If you agree that we need to do something different, speak up and get involved! Maybe together we can relieve some of the frustration.
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| Richard Langley Jr   |                | Energy and Environmental Protection, Dept Of| Carrying handguns in state forests      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/8/2013 10:02:08 AM |
| Jimmy Couture        | Bristol        | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests       | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/8/2013 10:53:09 AM |
| Mark Wiggins         | Waterford      | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests       | Even though you have ignored us before, I request the following:  
Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
There is NO LOGICAL reason for these laws. | 11/8/2013 12:29:41 PM |
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<tr>
<td>Kevin Anderson</td>
<td>Portland</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forests</td>
<td>11/8/2013 12:35:13 PM</td>
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<tr>
<td>Jesse Merly</td>
<td>Fairfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>11/8/2013 2:02:41 PM</td>
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<tr>
<td>Shaun Buck</td>
<td>No Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>11/8/2013 3:26:09 PM</td>
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- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

- While in an isolated areas the need for personal protection is greatest. Given the fact that law enforcement would not be able to locate my position let alone arrive in a timely manner in an instance where my life would be threatened.

- Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
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| Kathleen S. Weberg   | Norwalk           | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | Please change the State Agencies Regulations to allow individuals with a valid CT Pistols and Revolvers Permit to carry a handgun for self defense while in Connecticut State Parks and Forests. Specifically:  
- Remove the prohibition on the “carrying of firearms” in Section 23-4-1(c) of the Connecticut Agencies Regulations.  
- Add an exemption to Section 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/8/2013 3:26:20 PM       |
| Kenneth Prince Jr.   | E. Norwalk        | Energy and Environmental Protection, Dept Of | Handguns in state parks & forests         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/8/2013 5:50:18 PM       |
| Claire Wong-Ostapowicz | Wallingford      | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Patrick Lacy       | Energy and Environmental Protection, Dept Of      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/8/2013 7:29:48 PM |
| Patricia Estok     | Environmental Quality, Council On                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/8/2013 7:30:32 PM |
<p>| Matthew Cassina    | CCDL, Firearms Permit Examiners, Board Of         | By limiting state parks and forests to a &quot;gun free zone&quot; you now put everyone at risk of a mad man and you give these crazy people another place they know no &quot;law abiding&quot; citizen will be legally carrying a firearm. |                                                                                                  | 11/8/2013 7:50:10 PM |</p>
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<tr>
<th>Name</th>
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| Paul Haefner | New Hartford | Energy and Environmental Protection, Dept Of | Handguns in State Forests/Parks | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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Pistol Permit holders go through training and background checks and I feel they should be allowed to carry their handguns while enjoying the parks and forests just as any other citizens. |
| William A Clark | Trumbull | Energy and Environmental Protection, Dept Of | Handguns in State Forests/Parks | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| John Leone | New Britain | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Vincent Ierace  | New Milford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Anthony Fusco   | Tolland  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Justin Moser    | Southbury | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Joseph Giordano</td>
<td>Torrington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<td>louis vuitton outlet</td>
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<td>louis vuitton outlet</td>
<td>louis vuitton outlet</td>
<td>While advertising in print or publishing Medias can be an expensive proposition, personalising promotional items with your brand name and logo can be a cost efficient yet effective mode of advertisement.</td>
</tr>
<tr>
<td>John Dinsdale</td>
<td>Shelton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Concealed carry</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Charles Casciotta</td>
<td>Bristol</td>
<td>Energy and Environmental Protection, Dept Of</td>
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| Dustin Flagge        | Northford      | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| David R. Buckley     | New Britain    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/10/2013 10:15:44 PM |
| Matthew Ferrante     | New Milford    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| David E Polett    | Darien, Connecticut | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers, to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense. | 11/10/2013 10:26:30 PM |
| Bill Gagnon       | New London       | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/10/2013 10:39:19 PM |
| Nelson Goewey     | Southington      | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/10/2013 10:47:00 PM |
<table>
<thead>
<tr>
<th>Name</th>
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</thead>
<tbody>
<tr>
<td>Donald Gordon</td>
<td>Montville</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>11/10/2013 10:58:20 PM</td>
</tr>
<tr>
<td>Douglass A Coy</td>
<td>Oxford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>11/10/2013 11:15:52 PM</td>
</tr>
<tr>
<td>Ronald J. Chiasson Jr.</td>
<td>Portland</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>11/10/2013 11:16:57 PM</td>
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<td>Name</td>
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<tr>
<td>Peter E Snyder</td>
<td>none</td>
<td>Clinton Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State forests, parks</td>
<td>23-4-1(c) and 26-66-2</td>
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<td>Matthew Strasser</td>
<td>New Britain</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
</tr>
<tr>
<td>Jeffrey Lockwood</td>
<td>Plantsville</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
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<td>Name</td>
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<td>Agency</td>
<td>Request Content</td>
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| Eric Fournier | Wallingford  | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Best Regards.                                                                                                    | 11/11/2013 |
| AJ Wilkins    | West Hartford| Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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Best Regards.                                                                                                    | 11/11/2013 |
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<th>Section (s)</th>
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</table>
| Scott Skurja |                | Energy and Environmental        | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 4:45:43 AM              |
| harold douglas | new britain    | Energy and Environmental        | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 5:14:48 AM              |
| Richard Smith | Norwalk        | Energy and Environmental        | 23-4-1c & 26-66-2     | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 5:40:49 AM              |
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<th>Location</th>
<th>Department</th>
<th>Request</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Joseph Leo</td>
<td>Weston</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forests</td>
<td>11/11/2013 6:18:50 AM</td>
</tr>
</tbody>
</table>

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self-defense while in CT State Parks and Forests, specifically:

- Remove the prohibitions on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self-defense.

Dear Sir; As that I am trained in the use and carry of firearms/pistols, and I hold a valid pistol permit, I should be legally allowed to carry in State Parks in Connecticut.

Please allow carry of Pistols and Revolvers in State Parks to those allowed the right to carry. Thank You.
<table>
<thead>
<tr>
<th>Name</th>
<th>Location</th>
<th>Department</th>
<th>Reason for Action</th>
<th>Date</th>
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<tbody>
<tr>
<td></td>
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<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</td>
<td>6:20:05 AM</td>
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<tr>
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<td>6:21:26 AM</td>
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<td>6:31:58 AM</td>
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| April Ludwig       | Winsted    | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 23-4-1(c) and 26-66-2     | 11/11/2013 6:46:01 AM |
| Matthew Ludwig     | Norfolk    | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Raymond Fasano Jr  | Wolcott    | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
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<tbody>
<tr>
<td>Steven Fortini</td>
<td>Enfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>11/11/2013</td>
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<td></td>
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<td>23-4-1(c) and 26-66-2</td>
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|                       |            |                                             | 23-4-1(c) and 26-66-2                                                | 7:15:30 AM |
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| William Gorman  |          | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 7:21:44 AM |
| Martial La Roche| Marlborough | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 7:21:58 AM |
| David M Pope    | Ridgefield | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| James Stanley| Glastonbury | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Joseph Locke | Milford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Sally Wright | Vernon  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| David Ogan      | Unionville | Energy and Environmental Protection, Dept Of   | Carrying handguns in State Forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 | 7:48:33 AM |
| Robert Ballas   | New Fairfield | Energy and Environmental Protection, Dept Of | Carry handguns in State Forests & Park Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 | 7:54:12 AM |
<p>| Russell Lowry   | Coventry   | Energy and Environmental Protection, Dept Of   | Carrying pistol in state parks Prohibition is a bad idea again. I would prefer to have armed fellow citizens with permits and training by my side in the woods, than to find myself facing an evil doer in the woods now that you have told them where they can go for out of the way, unseen access to potential victims. You are creating criminal hunting grounds. | 11/11/2013 | 7:59:23 AM |</p>
<table>
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<th>Date and Time</th>
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| Pablo Torres | new haven  | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 8:00:15 AM |
| Kenia Torres | new haven  | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 8:00:49 AM |
| Janine Mulder| Windsor    | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>RUDY ALTIERI</td>
<td>WILTON</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>CARRYING HANDGUNS IN STATE FORESTS</td>
<td>11/11/2013 8:27:12 AM</td>
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<th>Issue</th>
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<tr>
<td>Charles Griffin</td>
<td>Glastonbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
</tr>
<tr>
<td>Gary DiPietro Sr.</td>
<td>Oxford</td>
<td>Firearms Permit Examiners, Board Of</td>
<td>Ammunition sales in private clubs</td>
<td>Our club has many youth members who shoot trap and skeet at our club. Some of them are members without their parents being members others are children of members. We need clarification on giving/selling ammo to them to use at our private club. The ammunition would only be used at our club and would not leave the property.</td>
</tr>
<tr>
<td>Jared Kohut</td>
<td>Meriden</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Regulations</td>
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<tr>
<td>Robert Weaver</td>
<td>Wolcott</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>No</td>
<td>23-4-1 and 26-66-2</td>
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<tr>
<td>Stephen J. Savino</td>
<td>Burlington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>No</td>
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</tr>
<tr>
<td>laddie sacharko</td>
<td>Chaplin</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>No</td>
<td>23-4-1(c) and 26-66-2</td>
</tr>
</tbody>
</table>
| Daniel Jaramillo | Stonington | Energy and Environmental Protection, Dept Of | Carrying handguns in State forests | 23-4-1(c), 26-66-2 | Sir,  
Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Thank you.  
Respectfully, Mr. Daniel Jaramillo | 11/11/2013 9:13:06 AM |
<table>
<thead>
<tr>
<th>Gary Mahaffy</th>
<th>Plainville</th>
<th>Energy and Environmental Protection, Dept Of</th>
<th>cary of handguns in state forests/p</th>
<th>23-4-1(c) and 26-66-2</th>
</tr>
</thead>
</table>

Fill out your Name, Email Address and Town.

Select "Energy and Environmental Protection, Dept of"

Field Regulation Subject Matter: enter Carrying handguns in State Forests and Parks

Field Regulation Section Number: Enter 23-4-1(c) and 26-66-2

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Thank you for your attention.
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| Shirley Mahaffy    | Plainville           | Energy and Environmental Protection, Dept Of    | I would like you to modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
 - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
 - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 9:25:56 AM |
| Nancy Borzino      | Thomaston            | Emergency Services and Public Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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 - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 9:33:14 AM |
| Donald Willette    | Seymour              | Energy and Environmental Protection, Dept Of    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<table>
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<th>Issue</th>
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</tr>
</thead>
<tbody>
<tr>
<td>Wayne Rautenberg</td>
<td>Manchester Police (RET)</td>
<td>Manchester</td>
<td>Carrying a firearm in state parks and forests</td>
<td>Governor, Please reconsider amending the bill forbidding the carrying of a firearm in state parks and forests. Several years ago congress passed a bill allowing the carrying of fire arms in federal parks. One should be able to protect there family and self from predators be they human or animal. Thanks.</td>
<td>11/11/2013 9:42:16 AM</td>
</tr>
<tr>
<td>Gary L. LaPlante</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Simsbury</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>11/11/2013 9:47:22 AM</td>
</tr>
<tr>
<td>Stephen Granoth</td>
<td>CCDL</td>
<td>Morris</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Janice M. LaPlante, Ph.D. | Simsbury      | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 9:48:30 AM |
| Becky M. LaPlante     | Granby        | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 9:49:51 AM |
| Laura L. LaPlante     | Collinsville  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<th>Name</th>
<th>Town</th>
<th>Agency</th>
<th>Topic</th>
<th>Section Numbers</th>
<th>Suggested Action</th>
</tr>
</thead>
</table>
| Richard Blake      | Northford       | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests       | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Lynn Casassanta    | East Hartford   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests       | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Kim Way            | Wethersfield    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests       | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Comments</th>
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| Michael Burke        | Energy and Environmental Protection, Dept Of | carrying of handguns in state fores | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Anthony F. Caruso    | NRA                   | Watertown       | Firearms Permit Examiners, Board Of Permits allowed in state parks                                                                                                                                                                                                                                                                                              |
| William Creech       | CCDL                  | Norwich, CT     | Energy and Environmental Protection, Dept Of Carrying handguns in State Forests 23-4-1(c) and 26-66-2 I feel citizens with a license to carry permit should be allowed to carry their weapon for defensive purposes in State Forests.  
Isolated trails away from civilization and public eyes are a great place for criminals to pray on victims. It is one of the places I feel least comfortable being unarmed.  
I take the right to carry very seriously and feel every citizen has the right to protect themselves from harm with lethal force as a last resort. I also feel that criminals are less likely to harm others if they know that there is potential to be harmed themselves.  
There is no better way to advertise a place for a criminal to conduct business than to declare a place where the innocent will be unable to defend themselves. |

11/11/2013 10:11:22 AM  
11/11/13 10:19:43 AM  
11/11/2013 10:25:34 AM
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<th>Department</th>
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<td>Ted Crisciulo Jr.</td>
<td>Hamden</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Philip Kurze</td>
<td>Colchester</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the &quot;carrying of firearms&quot; in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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This section sets forth the requirements that apply to owners/operators of regulated underground storage tank that have leaked. The section was adopted in 1994 and is now outdated. Since 1994, DEEP has adopted the Remedial Standard Regulations, it created the Licensed Environmental Program and it issued its Site Characterization Guidance Document, which together describe how virtually all other environmental investigation and remediation in the state must be conducted. Moreover, because §22a-449(d)-106 applies only to owners and operators of tanks, the same spill can be subject to two different sets of response requirements, depending on whether the work is being performed by the tank owner or the land owner.

This inconsistency between the requirements that apply to cleaning up leaks from underground tanks and spills from any other sources results in uncertainty for the regulated community as to how the investigation and clean-up should occur, who must conduct it and when it is deemed complete. The inconsistency in requirements also causes a duplication of efforts by both the regulated community and the DEEP without any added benefit to the environment.

The current language in §22a-449(d)-106 is based on federal model regulations and EPA must approve any changes. The requirement for approval does not preclude changes to the regulations, however. EPA has granted such approval for other states, such as New Jersey, who revised the federal model of the regulations to make them compatible with their state remedial programs. Some states have adopted underground tank release response regulations that omit the equivalent of §106 entirely and simply refer to the remedial regulations that apply to all releases. I respectfully ask that the State of Connecticut consider a similar revision.

Thank you.
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<tr>
<th>Name</th>
<th>City</th>
<th>Agency</th>
<th>Email Address</th>
<th>Date</th>
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</thead>
<tbody>
<tr>
<td>Mike Butler</td>
<td>CCDL</td>
<td>Environnement Protection, Dept Of</td>
<td><a href="mailto:mike.butter@cdl.killingworth">mike.butter@cdl.killingworth</a></td>
<td>11/11/2013</td>
</tr>
<tr>
<td>Kenneth Fahey</td>
<td>Greenwich</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td><a href="mailto:kenneth.fahey@energy.gov.greenwich">kenneth.fahey@energy.gov.greenwich</a></td>
<td>11/11/2013</td>
</tr>
<tr>
<td>Michael Volovski</td>
<td>CCCD</td>
<td>Environnement Protection, Dept Of</td>
<td><a href="mailto:michael.volovski@cccd.killingworth">michael.volovski@cccd.killingworth</a></td>
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<td>Name</td>
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| Douglas Kneissl     | Derby Energy and Environmental Protection, Dept Of | Carrying handguns in State Parks | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 12:27:56 PM |
| Jim Gurn            | CCDL Trumbull Energy and Environmental Protection, Dept Of | Carrying firearms in state forest | How dare you and the Democrats prohibit law abiding citizens from our right to carry firearms in state forests  
Your and the legislators should be ashamed of yourselves  
I personally cant wait for the elections  
Your HISTORY !!! | 11/11/2013 12:38:35 PM |
| Peter Moses         | New Hartford Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 12:50:21 PM |
We are an executive search firm and in the past have been requested to respond to CT RFPs for our services. We have generally declined as these RFPs are overly bureaucratic requiring multiple forms, excess documentation and many signatures. The RFPs convey to the responder that we at the State believe you are inherently dishonest and we want you to complete all of these legal forms so we can catch you doing something wrong. To be successful on this business depends on a strong working relationship between the consultant and the hiring agency. Your RFP do not solicit that information.

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.
Please modify the state agencies regulations to allow individuals with valid permits to carry pistols and revolvers, to carry a handgun for self defense while in CT State Parks and Forests.

Specifically:
* Remove the prohibition on the carrying of firearms in section 23-4-1(c) of the Connecticut Agencies Regulations
* Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense.

This is especially critical in forests and state parks where there is little or no cell service and the long response times of public safety personnel would be of no help.
<table>
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</thead>
<tbody>
<tr>
<td>Richard R. Gott</td>
<td>Energy and Environmental Protection, Dept Of Carrying handguns in State Forests</td>
<td>Meriden, CT 06450</td>
<td>23-4-1(c) &amp; 26-66-2</td>
<td>Please modify the State Agencies regulations to allow citizens with valid carry permits to carry pistols and revolvers for purposes of self defense in our State forests and parks. Remove the prohibition on the 'carrying of firearms' contained in Section 23-4-1(c) of the Connecticut Agency Regulations, and add an exemption to 26-66-2 to allow for the carrying of pistols and revolvers (including handguns using centerfire ammunition) for the purposes of self defense. Thank You</td>
</tr>
<tr>
<td>Robert Gabris</td>
<td>CT voter</td>
<td>Stratford</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Peter A Wilson | Sterling | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<table>
<thead>
<tr>
<th>David Cox</th>
<th>Trumbull</th>
<th>Firearms Permit Examiners, Board Of</th>
<th>Necessity for the Board’s existence</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
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<td></td>
<td>The Board of Firearm Permit Examiners are a necessary, indispensable check upon local Police Departments that arbitrarily deny handgun permits to law-abiding applicants.</td>
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<td>Local police can and should deny a handgun permit application where there is specific, tangible, and documented reason. The Board's existence deters local Police departments from either denying or delaying ('tabling') applications out of either an insubstantiated distrust of the applicant or unofficial-yet-standard-policy.</td>
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<td>My own handgun permit application in 1999 was 'tabled' by the Trumbull Police for sixteen weeks, and they refused to advise me of when I might receive a disposition, even though CT statute requires a disposition within eight weeks. Had there been no Board, I would have had no recourse. But I wrote the Board to detail the delay, faxing a copy of that correspondence to the Trumbull Police. Two days later, my Town permit arrived in the mail.</td>
</tr>
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<td>My point is that without checks, power can be misused and/or abused. The Board of Firearm Permit Examiners -- again -- represents a necessary, indispensable check to assure that local Police departments comply with Connecticut statutes in the area of dispositioning handgun permit applications.</td>
</tr>
<tr>
<td></td>
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<td>Please do not allow the Board or the Board members to be subjected to political pressure, sanction, and/or otherwise impair their ability to perform their work that assures fair and equal treatment to law-abiding CT residents.</td>
</tr>
<tr>
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<td>I for one am thankful for the Board's existence.</td>
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<td></td>
<td>Thank you for the opportunity to voice my thoughts.</td>
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<td></td>
<td>David Cox</td>
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<td>Trumbull</td>
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<td><a href="mailto:roadguy56@gmail.com">roadguy56@gmail.com</a></td>
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<td>Danbury</td>
<td>Energy and Environmental Protection, Dept of</td>
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<tr>
<td>Carl Milano</td>
<td>Seymour</td>
<td>Energy and Environmental Protection, Dept of</td>
<td>Carry handgun in state forests park</td>
<td>Thank you</td>
<td>11/11/2013</td>
</tr>
<tr>
<td>Michael J. Weatherbee</td>
<td>Rocky Hill</td>
<td>Energy and Environmental Protection, Dept of</td>
<td>Carrying handguns in State Forests</td>
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<td>5:03:18 PM</td>
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Dear Governor Malloy,

I'm sure that in the aftermath of the Sandy Hook tragedy, you can appreciate the public debate on how to best protect children in school. I for one cannot fathom how we can positively see the need for an access chokepoint and mandatory metal detection screening -- operated by armed Law Enforcement -- at courthouses and key public facilities, and yet NOT see the foolishness of our current laws positively requiring of teachers / administrators that they be unable to protect defenseless children -- exposing those children to what we now realize is great danger. Not to be too glib, but as was well-stated in a famed movie, is there any other kind of danger?

The common thread between Adam Lanza, Omar Thornton (Manchester beer distributorship), James Holmes (Aurora), Seung-Hui Cho (Virginia Tech), and Eric Harris & Dylan Klebold (Columbine) is that all of them were attracted to committing their crimes in what are known as unenforced 'gun-free zones,' considering that all the perpetrators were keen to avoid a situation in which they would be confronted by anyone who even MIGHT be capably-armed. Those perpetrators chose unenforced 'gun-free zones' on the basis that everyone within was required -- by law -- to be disarmed, able to only run, or hide, or helplessly plead for mercy. In each case, when finally confronted by local police wielding deadly force, the perpetrator(s) either committed suicide or surrendered peaceably.

It is my contention and the contention of many, that had the perpetrator(s) of each shooting known beforehand that there would be at least one capably armed individual to confront them, they would have been deterred from committing their crimes.

I am aware that placing an armed police officer or armed security guard within each school is impractical, budget-wise ... and yet something truly effective must be done to better secure safety of children in school.
I do not advocate that any teacher or school administrator holding a handgun permit be automatically allowed to carry a handgun in school. I believe that not even nearly all responsible handgun permit holders can handle the far-greater responsibility of carrying a handgun within a school environment. Still fewer could be counted upon to act both safely and courageously in the event of an armed incursion.

I DO advocate that a State-funded psychological screening program and training program applicable to implementing legal in-school carry of a handgun for the protection of its children be made available to any handgun permitted teacher / administrator VOLUNTEER. Such a volunteer who passes prerequisite psychological screening could be subsequently trained to safely carry a handgun in a school environment, to recognize and avoid situations in which use of deadly force is inadvisable or inapplicable, even though it might initially seem necessary, and to think clearly in the presence of a deadly threat.

It should be the State’s expectation that each school could field at least one teacher / administrator who has passed both the psychological screening & training, and is willing to use that training to better-safeguard children within the school in which he/she works. Larger schools would undoubtedly field more teachers / administrators; perhaps several.

It would be essential to such a program that the public be conspicuously made aware of it, not only through mass-media, but especially through a notice conspicuously posted on the doors of the schools, stating, “Armed personnel present to protect our children,” a very powerful deterrence to a gun-wielding coward looking to impose himself upon the defenseless.

The program’s psychological screening and the training would be of far less expense to CT taxpayers compared to staffing every school with a police officer or contracted armed security guard. I expect that the State Police Training Academy could field plenty of volunteers willing to donate their time in seeing to
implementation of such a program.

In the end, the measure of such a program’s value is in how many lives might such a program save? The problem with that value assessment is that the number of lives saved by deterring another armed school incursion are intangible and elusive, in that an averted tragedy cannot be documented.

Look at this in absolute terms; might ONE life be saved by a program that has real deterrent effect upon criminals and puts up a last line of defense against an incursion? If you can answer ‘yes,’ then I think you can agree then the program I propose is well-worth the expense and effort to implement it. I do hope you will consider it.

Thank you for the opportunity to express my thoughts.

David Cox
Trumbull
roadguy56@gmail.com
<table>
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<tr>
<th>Name</th>
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<th>Agency</th>
<th>Topic</th>
<th>Proposed Changes</th>
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| Paul Mathieu          | Norwich                     | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| David E. LaPorte      | Rockville Fish & Game Club, CCDL, NRA | Ashford Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Michael Robidoux      | East Haddam                 | Energy and Environmental Protection, Dept Of| Carrying Firearms in State Forests           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Bill Unger | Oxford  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Mark Vose  |         | Energy and Environmental Protection, Dept Of | Carrying handguns in state Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/11/2013 7:36:09 PM |
| mike Lavoie| Shelton | Energy and Environmental Protection, Dept Of | right to self defense in state fore | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>John Mezzanotte</td>
<td>Southington</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>23-4-1(c) and 26-66-2</td>
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<td>James Gauthier</td>
<td>Retired Sergeant-Town of Groton Police Department</td>
<td>Groton Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
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<td>k. raymond</td>
<td>east haven</td>
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<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Richard Mitchell</td>
<td>Chester</td>
<td>Emergency Services and Public Protection, Dept Of</td>
<td>carrying gun in state forests and parks</td>
<td>23-4-1</td>
<td>26-6-2  To allow to carry guns in state forests and parks, Thank you</td>
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<tr>
<td>Rob Miller</td>
<td>Canterbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c)</td>
<td>26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Stephen Pickford</td>
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<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c)</td>
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| Janice Mandel      | Shelton        | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| dennis drown       | Southbury      | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Anthony Joseph Ferrara | Derby         | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| David Irwin | Griswold | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Clare Waterman Irwin | Griswold | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Robert V. Raby | Meriden | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>Patrick D. Malloy</td>
<td>Occupational &amp; Professional Licensing Division</td>
<td>Stamford Consumer Protection, Dept Of Architectural Licensing Board</td>
<td>The Department of Consumer Protection Occupational &amp; Professional Licensing Division has an opportunity to streamline procedures to get an Architectural License. The current procedures are outdated and the forms that are required by applicants to be filled out are outdated as well. The process is redundant and is already covered by the National Council of Architectural Registration Boards (NCARB). In addition, the CT Architectural Licensing Board asks for an applicant to submit an Application for Architecture License to verify score report on the Architecture Licensing Exam (ARE administered by NCARB), these scores are already reported directly to the CT Architectural Licensing Board which is a redundancy again. Most States that have direct reporting by NCARB (like Connecticut) have more streamlined procedures and CT has an opportunity to get up to date.</td>
</tr>
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| Marcus Wilczak        | Energy and Environmental Protection, Dept Of | Bristol Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Martin Hamilton   | Meriden     | Energy and Environmental Protection, Dept Of    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Joe Cantillon     | Waterbury   | Energy and Environmental Protection, Dept Of    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<td>Rick Moody</td>
<td>Vernon</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Paul Green</td>
<td>East Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Emergency Services and Public Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. Thank you in advance for your attention, and public opinion in this matter.

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations
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Allow carrying defensive handguns in Forest and Parks

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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.
Thank you for the offer of feedback, and I think it is a great idea….. if someone is reading and reflecting with purpose. I apologize but have no time to find (impossible task) the specific regulations relating to the following issues. If the quid pro quo is that I have to find somewhere in the literature the exact citation before anyone will pay attention, I have not a nd simply do not have the time in my 70+ hour work week.

Overall, I do not feel that the State of Connecticut in general is a great State to do business. We are pushing business out because of taxes, gas pricing, medical reimbursements, and medical practices inability to create enterprise. Two items specifically are:

1) This year, in January and February, we had the highest "call out" ratio in history. Our Practice does give PTO, or paid time out to all staff, that they can take as they earn it. The State law that now says they can call out "sick" and be paid regardless of whether they have earned the time as yet is not helpful. If an employee plans in our Practice they can take 3 days over the following year. That is fair and reasonable.

   a. If you do not like the job’s benefits, get another job. Forcing businesses to offer paid time is handing employees a perk they haven’t earned, and is simply more of the philosophy that rewards bad behavior and punishes the staff who come in. We, who already offer it, are experiencing people "calling out" because they can. The State appears to support a program which is very easy for any employee to abuse. It penalizes good employers, and rewards employees who would manipulate the system.

2) We would like very much to build our own Operating Room. Connecticut is a "zero CON State" and we cannot do this. It inhibits our ability to:
a. Compete with our contemporaries for better health care pricing

b. Forces insurance carriers to pay higher prices for Hospital settings, almost double.

c. Constricts our ability to get better contracted reimbursement rates with insurance carriers.

d. Inhibits our ability to grow our business, provide better patient access to care, and simplify the surgical process for patients

e. Inhibits our ability to recruit orthopaedic doctors into the State. In addition to the sub par reimbursement levels, physicians like to be able to work in a free standing OR, it is much more efficient, and costs patient, insurance carrier and doctor less money and time.

If you got past the first paragraph, I appreciate your reviewing these comments.

[cid:image003.png@01CEDACA.B1AAE8E0]

Joe-Annis Iodice
Executive Director
Compliance Officer
Comprehensive Orthopaedics
863 North Main St. Extension Ste 200
Wallingford, CT  06492
Office: 203 741-6547
Cell:  203 313-9029
Fax:  203 741-6575
www.comclic.com
jai@comclic.com<mailto:jai@comclic.com>

"Individuals play the game, but teams beat the odds." - SEAL Team Saying

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entity to which it is addressed. It may contain information that is privileged, confidential and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient or the employee or agent responsible for delivering the message to the intended recipient, you are hereby informed that any use, disclosure, distribution or copying of this message and any attachments is strictly prohibited. If you have received this message in error, you are directed to delete it immediately.

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signing duplicate medical orders

I take care of several developmentally disabled adults who live at group homes and attend sheltered workshops. I have to sign several pages of medical orders for each person every 90 days or so and this is an activity that I essentially do for free as it occurs outside of patient visits and I can not bill for it.

The current regulations (I think from DMH or DDD) require I sign an original copy of each page for the group home and then a second copy of each page for the sheltered workshop. The orders arrive as NCR (newer version of carbon paper) triplicate forms and once I sign the top page, my signature appears on all 3 copies. Then I have to again sign one of the copies again so the pages that go to the sheltered workshop have an original signature and not a carbon copy. This amounts to a lot of wasted time for me. Eventually with electronic records, both places will just have to look at a computer and see that I have electronically approved a single set of orders. I suggest modifying the law or regulations so the physician can sign one set of orders and if they want a copy at the sheltered workshop, they can accept the carbon copied signature that appears on the page they receive.

--
Jeffrey M. Kagan, MD

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To whom it may concern, the following was taken from the DEEP web site; "Can I continue to hunt deer or small game with my Bushmaster AR-15 rifle? It depends on where you hunt, since possession is restricted. There are new requirements for the possession of certain types of center-fire assault style semiautomatic rifles and some shotguns which will require the owner to register those firearms with the Department of Emergency Services and Public Protection prior to January 1, 2014 (Download Registration Form). Once registered, those specific firearms still cannot be used on any public lands but they may be used for hunting on the owner's own property or on private lands with express permission of the landowner. Download a complete listing of the restricted firearms which require DESPP registration and can only be possessed under certain conditions." First off, to hunt deer in Connecticut you have to use a 6mm round or larger, an AR-15 is made in two calibers, the .223 or know as 5.56mm and the .308 caliber, so how is it that whom ever wrote this did NOT put in there that the .223 or 5.56mm can NOT be used for deer hunting, only 6mm or larger. It seems that alot of misinformation is being given out on state weapons and hunting laws or are people at the DEEP just making up laws as they feel? Robert Staukovsky 34 Rockland Avenue Stratford, CT. 06614 Cell 1-203-449-4321 ---1412092350-788968489-1383055153=:60281<
To Whom It May Concern;

I am a long time early childhood education center serving children of six weeks through twelve years of age. My concern is not so much the existing regulations, but for some entities in our state, lack of regulations. In many areas of the state, town recreation departments and certain non-profit groups are running school age programs in our school systems, and do not have to report whatsoever to the Department of public health. This saves them much time and money, and the safety and health issues we need to adhere to as private business owners is exempt for town sponsored non-profits. This is hurting our businesses greatly, as we cannot afford to lower our costs given our overhead, and I’m pretty sure that most families do not know that their school-age program is unregulated. This means no safety measures required, no background checks required, and no staff to child ratios are required. State Regulations need to apply to EVERYONE running a program for children, not just some. When questioning Department of Health, I have been told, "we have no jurisdiction over that". It simply does not make sense, and liability concerns must be considered, for the programs and the families. Please consider looking into this.

Sincerely, Cathy W. DelGreco, Owner/Director, New England Preschool Academy, Inc. 860-627-6575

11/6/2013 2:09:45 PM
I am an avid ATV rider, but because ATV's are not allowed to be used ANYWHERE legally in Connecticut, I am forced to drive all of the way to Western Massachusetts to ride legally.

I am forced to register all 3 of my ATV’s in Massachusetts, pay the sales tax to Mass and also a yearly registration fee.

I would much rather have a closer place to ride and to be able to keep my tax dollars here in Connecticut. I agree not every state park should be open to ATV or motorcycle(Dirt bike) but some of them should be. Respect the rights of everyone who wants to use our state parks and not just those who enjoy hiking, horseback riding or mountain bike riding.

On a regular basis I read about people getting arrested in the local towns for illegally riding and maybe the arrests could be reduced if people actually had a safe and legal place to ride.

The ability for residents to legally ride would also have a very positive impact on the state Powersports dealers and I’m sure they would see an increase in sales.

Thank you,
Tom Wilkinson
69 Woods Hill Rd
Northford, CT 06472

11/5/2013 1:24:41 PM
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<td>Rocky Hill</td>
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| Mariusz Zalewski| East Hampton    | Energy and Environmental Protection, Dept Of| 23-4-1(c), 26-66-2                             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Justification: There are still dangerous animals roaming CT parks and forests. Having a firearm will give individuals with valid permits a chance to defend themselves, people around them against vicious, rabbit animals. It will also give them a chance to defend themselves and people around them in case of a violent crime where loss of life, limb or eyesight is imminent. | 11/12/2013 6:51:24 PM |
| Mike Sullivan   | Southbury       | Energy and Environmental Protection, Dept Of| Carrying handguns in state forests            | Please modify the state agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT state parks and forests. Specifically:  
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  -add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using centerfire ammunition) for the purposes of self defense. | 11/12/2013 7:04:47 PM |
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<td>Columbia</td>
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<td>Tina Binheimer</td>
<td>Tolland</td>
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| Kevin P. Dunn      | Stratford        | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/12/2013 9:04:09 PM |
| William Donahue    | Portland         | Energy and Environmental Protection, Dept Of | I am asking you to please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests.  
Specifically:  
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Thank you for your consideration. | 11/12/2013 9:22:18 PM |
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<td>Grant H.</td>
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<td>Edward Aldrich</td>
<td>Goshen</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>11/13/2013 7:34:27 AM</td>
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Dear Governor,

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense

Thank you.
| Joy | Burlington | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Oriane Alves | FAIRFIELD | Energy and Environmental Protection, Dept Of | Carrying Hanguns in States Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Steve Price | Tolland | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) & 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Joseph Justus     |              | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to carry pistols and revolvers to carry a handgun for self defense while in CT state parks and forests. Specifically: Remove prohibition on the "carrying of firearms" in section 23-4-1(c) of the Connecticut Agencies Regulations. 
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

  Thank you for your time,
  Sincerely, Mr. Joseph Justus | 11/13/2013 9:50:07 AM |
| Michael Chiloyan  | New Britain  | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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| Giulio Cancellieri| Rocky Hill   | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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| Ronald T. Cimini   | North Haven, CT   | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Christine Gray     | Tolland           | Energy and Environmental Protection, Dept Of| Enter Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Paul T Orsino Jr   |                   | Energy and Environmental Protection, Dept Of| Carry of pistols and revolvers | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<th>Regulations Clause</th>
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| Paul Dummitt Jr     | Farmington                    | Emergency Services and Public Protection, Dept Of | Carrying handguns in state parks | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Andrew Lukban       | Hartland                      | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | My 2nd Amendment right to self defense as guaranteed by the Constitution of these United States should not be invalid when I am on public property. It should be honored.  
Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Brian Broadrick     | Naugatuck                     | Energy and Environmental Protection, Dept Of | handguns in State Forests/Parks | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Enfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forest 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>11/14/2013 9:02:44 PM</td>
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</tbody>
</table>
| Edwin Cay | East Windsor | Energy and Environmental Protection, Dept Of | carrying handguns in state forest a       | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/15/2013 12:48:16 AM |
| Brian King | Norwich    | Energy and Environmental Protection, Dept Of | State parks and forests                    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  

Thank you Brian King | 11/15/2013 8:04:19 AM |
<p>| Kevin      | Burlington | Public Health, Dept Of Day Care       | 19a-79-4a(a)(1)                            | Change requirement for adult physicals from 24 months to 36 months.                                                                            | 11/15/2013 9:26:13 AM |
| Kevin      | Burlington | Public Health, Dept Of Day Care       | 19a-79-6a(c)(11)                           | Increase years first aid manual is good for from 5 years to 10 years.                                                                            | 11/15/2013 9:30:36 AM |</p>
<table>
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<tr>
<th>Name</th>
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<tr>
<td>Todd Hillebrecht</td>
<td>Bristol</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>11/15/2013</td>
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<td>Kevin P. Parent</td>
<td>PLANTSVILLE</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carrying handguns in State Forests</td>
<td>11/15/2013</td>
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<td>Kevin</td>
<td>Burlington</td>
<td>Public Health, Dept Of</td>
<td>Day care</td>
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Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers for self defense while in Ct State Parks and Forests. Specifically:

- Remove the prohibition on the "carrying of firearms" in Section 23-4-1(c) of the Connecticut Agencies Regulations.
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.
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<tr>
<th>Name</th>
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<th>Proposed Changes</th>
<th>Date and Time</th>
</tr>
</thead>
</table>
| James Garlock   |                  | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/15/2013 1:16:10 PM  
| Dennis Rae jr.  | Colebrook        | Energy and Environmental Protection, Dept Of    | 23-4-1                                    | I think u should let people to carry a hand gun in state forest. As long as they have a permit | 11/15/2013 7:11:11 PM  
| Robert Reid     | Stafford Springs | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/15/2013 8:01:04 PM  

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<th>Carrying Handguns in State Forests</th>
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</tr>
</thead>
</table>
| mike thibault                 |               | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Christopher M. Gazsi          | NAUGATUCK     | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Peter Brown                   | Middlefield   | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please change the regs to allow pistol permit holders access to these areas. Pistol permit holders go through an FBI background check as one of the criteria for getting the permit. The bad-guys who don't (and can't) get a pistol permit ignore your laws anyway, so I don't see why the laws should stop only the people who have passed the background checks. Thank you,  
  Peter Brown, 93 Baileyville Rd. Middlefield CT. 06455 |
<table>
<thead>
<tr>
<th>Name</th>
<th>Location</th>
<th>Department</th>
<th>Carrying handguns in State Forests</th>
<th>Regulation Reference</th>
<th>Requested Action</th>
<th>Date</th>
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</thead>
</table>
| mike baio                 | Old Saybrook    | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/16/2013 12:08:23 PM |
| Peter T. Obuchowski       | Griswold        | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/16/2013 12:34:27 PM |
| Richard M Giannini        | New Britain     | Energy and Environmental Protection, Dept Of    | 23-4-1(c) and 26-66-2             |                      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/16/2013 3:14:09 PM |
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<tr>
<td>Joseph F. Keane III</td>
<td>Derby</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Handguns in St. Forests &amp; 23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>11/16/2013 3:48:05 PM</td>
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<tr>
<td>Shane Nadeau</td>
<td>plainfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>11/16/2013 7:50:30 PM</td>
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<td>Matthew Glidden</td>
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<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Justin Doss</td>
<td>Middlefield</td>
<td>Energy and Environmental Protection, Dept Of State Parks and Forests. Specifically: Carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Jonathan Zeman</td>
<td>Stamford</td>
<td>Energy and Environmental Protection, Dept Of State Parks and Forests. Specifically: Carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Jack Kelley</td>
<td>Stamford</td>
<td>Energy and Environmental Protection, Dept Of State Parks and Forests. Specifically: Carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Jennifer | Energy and Environmental Protection, Dept Of | carrying hand guns in state forests | 24-4-1c 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/17/2013 8:55:25 AM |
| Michael Giangregorio | Clinton | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Governor or Whomever reads this,
Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
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<td>AnnMarie Gazsi</td>
<td>Oxford</td>
<td>Energy and Environmental Protection, Dept Of Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>louis vuitton outlet</td>
<td></td>
<td>louis vuitton outlet</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Keep in mind that a perfume may smell differently once it leaves the store, and after wearing it for an entire day.</td>
<td></td>
</tr>
<tr>
<td>Michael Pisano</td>
<td>Bethel</td>
<td>Energy and Environmental Protection, Dept Of Carrying hand guns in state parks</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Shane Carlson</td>
<td>Litchfield</td>
<td>Energy and Environmental Protection, Dept Of handgun carry: state parks/forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>sean mcintyre</td>
<td>bristol</td>
<td>I don't know</td>
<td>carry in public parks</td>
<td>Its our land. We have a right to protect our selves on our own land.</td>
<td>11/18/2013 1:34:31 AM</td>
</tr>
</tbody>
</table>
| Christine McEvoy| Oxford     | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forests       | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/18/2013 7:26:20 AM       |
| Tim Sotolongo   | Shelton    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/18/2013 8:45:16 AM       |
| Patrick Smith   | Montville  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/18/2013 9:22:10 AM       |
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<th>Section Numbers</th>
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| Jonna Ambur           | North Haven| Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/18/2013 |
| Daniel W Rhoads       | Barkhamsted| Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/18/2013 |
| Richard Borecki       | Cheshire   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | While the following was pre-written, I FULLY support the proposal and strongly encourage the changes. Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Anthony Colucci | Trumbull   | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the "carrying of firearms" in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/18/2013 |
| David Robertson | Branford   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<th>Issue</th>
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<tr>
<td>Roger Cormier</td>
<td>Wethersfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
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<td>Robert Arseneault</td>
<td>Watertown</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<td>Gary Svenningsen JR</td>
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<td>Energy and Environmental Protection, Dept Of</td>
<td>carrying a handgun in state forest</td>
<td>23-4-1(c) / 26-66-2</td>
<td>11/18/2013 5:05:22 PM</td>
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- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
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<td>GORDON JONES</td>
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<th>Fred Pasler</th>
<th>Burlington</th>
<th>Energy and Environmental Protection, Dept Of</th>
<th>23-4-1(c) and 26-66-2</th>
<th>11/18/2013 7:29:43 PM</th>
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<th>Alicia Glifort</th>
<th>Northford</th>
<th>Energy and Environmental Protection, Dept Of</th>
<th>Carrying handguns in State Forests</th>
<th>11/19/2013 8:07:13 AM</th>
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- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<td>Donald Aitken Sr.</td>
<td>Coventry</td>
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<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the &quot;carrying of firearms&quot; in Section 23-4-1(c) of the Connecticut Agencies Regulations. - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>11/19/2013 12:09:33 PM</td>
</tr>
<tr>
<td>Edward Sanchez</td>
<td>Shelton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in state forest and park 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Brian Bolter</td>
<td>Plantsville</td>
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<td>11/19/2013 3:21:50 PM</td>
</tr>
<tr>
<td>dano</td>
<td>Cromwell</td>
<td>Governor’s Office</td>
<td>Guns in parks Whats the problem?.</td>
<td>11/19/2013 5:25:28 PM</td>
</tr>
</tbody>
</table>
John Mastrianni Jr.

Derby

I don't know

Carry on State Park

Concealed Carry in State Forest should be allowed. I find it funny that in the same forest I carry a shotgun year round for hunting, but not a 9mm Pistol for self defense if someone tries to harm my family or myself when we are hiking...

11/19/2013
6:48:39 PM

mark moorman

NVCC-DOL- TRA-UI-AAG-Superior Court

Woodbury

Attorney General, Office Of The

DOL- AGENT for Federal TRA

The issue I raise is an ongoing problem with TRA administration, lack of the state to comply with the TRA, The problem is multifaceted, one area is the participants are not treated properly at many stages of the TRA. This infringes upon the participants UI benifits.

My case is still an issue, one of many , and many other are unaware of the problem due to the failure of the TRA management at the DOL. SO many are hur with out a recourse such as a appeal. As in my case, and extraordinary effort to force a appeal via help from state representative my case made it to the superior court.

But from the dol office and all the way up to the court the state failed to comply with honoring the TRA in totality. AT the court the state atty, AAG and the Judge were anaware of the nature and the working of the TRA. And strangely enough the state admitted it never handled one yet.

This is due to the state failing to allow participant to file a appeal to start with. That along with many other aspects of the TRA that were not followed by the State the program in effect hurts the participants, this is totaly oposite of the purpose of the TRA.

This case is documented UWY-cv-12-5016389-s .

There are problems at the * DOL, AAG, Court and all other supporting staff at the State for the program. This undermined the case before the superior court as the judge was impacted by the states statement and presentations that the TRA was not the ruling law over the TRA training program that was the central , focus of the appeal. * lack of TRA payment for 104 week and improper payments of UI.

11/19/2013
7:09:00 PM
This all transpired under the direction of dol staff, specifically Maria Lagasse. Who to date has failed to present the truth of the TRA program and provide the signed contact which the state engaged my participation as a qualified approved TRA participant.

I would like to follow-up this letter with a in person meeting to fully address the issues.

Thank you
Mark Moorman
* AT each step of this case the state failed to provide or support it’s status as the **(agent) for the Federal program.
| Stephen Strawinski | Enfield | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/19/2013 8:41:44 PM |

RCSA §22a-174-18(f) is an old air pollution regulation that dates back to regulations initially established in Los Angeles, California in 1949. The regulation contains a table that lists allowable emissions rates for particulate matter in pounds per hour based on the total weight in pounds of all materials introduced into a process that may cause the emissions of particulate matter. The emission limits in this regulation are based on the weight of material processed in an attempt to supplement standards based on air flow from stack exhausts for certain process industries (e.g., iron foundries, steel blast furnaces) because facility’s in these industries could have injected air to dilute the stack exhaust stream to comply with early air pollution regulations. At the time of passage, facilities subject to this regulation were all equipped with exhaust stacks where emissions could easily be controlled, and exhaust gasses could be sampled and emissions quantified. This process weight regulation was refined in 1959 by the Bay Area Air Pollution Control District in San Francisco, and this type of regulation was adopted by states across the nation before the Clean Air Act came into existence.

Today, the regulation rarely imposes conditions more stringent than newer air emissions standards on the types of processes originally intended to be regulated by this regulation. However, CTDEEP has begun to apply this old regulation to emissions from various fugitive sources that do not exhaust through a stack, and in that context, the regulation would prohibit many industrial operations in the state, including welding. The CTDEEP has sought to apply this regulation to outdoor abrasive blasting operations, which also cannot comply with the requirement, which was never intended to apply to fugitive emission sources. Furthermore, even if a fugitive emission source could use a calculation to demonstrate compliance with these regulations, such sources cannot demonstrate compliance through testing since fugitive emissions cannot be accurately measured. In addition, the regulation is not designed to address small particulates (PM 2.5 or PM10) but rather Total Suspended Particulates (TSP).
Particulates, which is no longer a pollutant regulated as a National Ambient Air Quality Standard.

The original purpose of this specific regulation was to control particulate emissions from certain industries that processed large volumes of material with exhausts that vented through point source discharges, all of which could be controlled with air pollution control equipment. It was not intended to address small emission sources, like welding operations, paint booths or abrasive blasting operations, which cannot be described by the title of section 22a-174-18(f), “Process industries – general.” Applying this regulation to all operations that are not process industries, as some CTDEEP personnel have suggested, would make certain activities, such as welding, illegal in Connecticut.

Section 22a-174-18(f) should be deleted as obsolete. If the Department concludes that it would be too difficult or time-consuming to delete the regulation, it should be revised to be similar to New York’s process weight regulation which restricts its application to ten specific emission sources that are listed in 6 NYCRR Part 212: General Process Emission Sources, section 212.9(e), most of which do not exist in Connecticut (e.g., lime kilns, glass production furnaces, gypsum dryers).
<table>
<thead>
<tr>
<th>Name</th>
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</table>
| Roger A. Diebel     | Preston    | Energy and Environmental Protection, Dept Of    | Carrying handguns in State   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/20/2013 |
| Jason Chasse        | Burlington | Energy and Environmental Protection, Dept Of    | Carrying handguns in State   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Robert Dingman      | Windsor    | Energy and Environmental Protection, Dept Of    | Carrying handguns in State   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Robert O'Connell            | Southington                        | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<p>| Mark R. Sussman             | Hartford                           | Energy and Environmental Protection, Dept Of | 22a-174-6         | This regulation sets forth requirements for air pollution emergency episodes. It has not been updated since 1993, and to my knowledge, the emergency episode steps called for by the regulation fortunately have not been triggered in decades, if ever. The Department should review the standards in the regulations to see if they are still appropriate. In addition, some of the steps called for under various emergency episodes need to be revisited. For example, if an emergency is triggered, no &quot;incinerators&quot; can be operated. Since Connecticut relies so heavily on resource recovery, shutting down all of these units could result in other health hazards. Moreover, the resource recovery facilities have modern air pollution controls that were not required when this regulation was initially adopted in the late 1970's or early 1980's. |</p>
<table>
<thead>
<tr>
<th>Name</th>
<th>Town</th>
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<th>Topic</th>
<th>Section Paragraphs</th>
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<tbody>
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<td>James L. Machie sr.</td>
<td>Willimantic</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forest</td>
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<td>11/21/2013 10:16:59 AM</td>
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<td>Ann Morse</td>
<td>Middletown</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Killingly</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Author</td>
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<td>Issue</td>
<td>Relevant Statutes</td>
<td>Suggested Action</td>
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| C. Messologitis | Stratford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Ken Locke | Sandy Hook | Energy and Environmental Protection, Dept Of | handguns in State Forests/Parks | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Christopher Byrne | Goshen | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Michael DeLany           |               | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests | 23-4-c(1) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Sheila foster            | Norwich       | Environmental Quality, Council On             | Carrying handguns in State Forests | 23-4-1(c) & 26-66-2 | Please modify the State Agencies Regulation to allow individuals with valid Permits to carry pistols and revolvers to carry a handgun for self defense while in CT State Parks and Forest. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Angela N Pellegrini      | North Branford| Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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For the green crowd, they are more acceptable over alternatives such as plastic bags.
<p>| Name               | Town     | Department                                      | Issue                                                                 | Date                  |
|--------------------|----------|------------------------------------------------|                                                                     |                      |
| larry deluca       | stamford | Firearms Permit Examiners, Board Of Firearm Regulations and Magazine | how about the illegal people that have more deadly weapons than most legitimate gun owners have? I think this is very unconstitutional to institute these regulations for honest firearm users. check how many Texas teachers and others have been able to stop offensive shooters in schools and malls and other buildings. i still appreciate you as a mayor but this law interferes with IPIC and Lipissic competitions, these are legitimate competitions and no one has ever shot anyone else in these competitions, this is a sad situation. be a fighter for the 2nd amendment rights. thank you, larry deluca stamford resident | 11/22/2013 3:20:57 PM |
| Riccardo Abate     | Branford | Energy and Environmental Protection, Dept Of Carrying hang guns in state forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/24/2013 1:54:13 AM |</p>
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<td>mike haeseler</td>
<td>ledyard</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<p>| Michael A. Palazzi | Andover | Policy And Management, Office Of | Ct gun law | I think this gun bill was rushed through the legislature at the insistence of the Governor due to the Sandy Hook murders. This is only makes it difficult for law abiding citizens to obtain guns and ammunition. It does nothing to stop the daily killings in all major cities in ct. It does nothing to suppress the flow of illegal guns in ct. It has nothing to penalize the person committing a crime with an illegal gun. I don't understand why it was rushed through before the report from the Governor appointed commission was available investigating the Sandy Hook murders. I'm sure there will be some good information that would be useful to include in any gun bill. I don't believe it is public to this date!! I sincerely feel this was a spur of the moment idea to control guns in ct. Some of the ideas in the bill are good and are needed for safety, but falls short on controlling crime in the cities. | 11/24/2013 12:58:02 PM |</p>
<table>
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| John            | Energy and Environmental Protection, Dept Of  | Carrying handgun in state parks an                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 11/24/2013 1:08:43 PM |
| Jeff McLaughlin | willimantic                                    | Energy and Environmental Protection, Dept Of       | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Rob Collin      | Energy and Environmental Protection, Dept Of  | Carrying handguns in State Forests/Parks           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Hyde Harman</td>
<td>Voluntown</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>11/24/2013</td>
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<td>It just seems to me that if I jump through all the requirement to carry a hand gun in Conn. it simply doesn't seem that I should be restricted as to where I carry one. This especially should be the case in the state forest system. Thank you, Hyde Harman</td>
<td>11/25/2013</td>
</tr>
<tr>
<td>Name</td>
<td>Address</td>
<td>Department</td>
<td>Request</td>
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| Vin Gaetano | CT Resident, Taxpayer, Hunter, Wallingford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  

Additionally, I am a trained firearm user (rifle, shotgun, handgun) and trained archer. (I completed TWO Handgun Cert classes, TWO Hunting Safety Courses, and One Bowhunter Safety class, all here in CT), and have a CT Firearm Permit  

In addition to my infrequent hunting, I am an avid hiker, and bicyclist (CT Rail Trails and some forests). I am deeply concerned about the increased presence / reported sightings of the Black Bear - I understand Connecticut has limited resources in managing this bear population, and I would enjoy the appreciate the added protection of my firearm.  

Kind Regards -  
Vin Gaetano  
Wallingford CT |
State regulations that harm

[Comment Emailed with an attachment]

Thanking you in advance for your consideration
--
*Maureen Griffin*
--089e0149411abf42f404ebf326af<
As a small CT manufacturer, with a payroll $1,994,000.00 / yr. our total insurance costs for employee Health Insurance was $342,000.00 / yr and Worker Compensation Insurance was $282,000.00 / yr ... Those 2 costs are 31% on top of that payroll figure. Within that $282,000.00 Comp figure was $3,457.00 for the Ct Accessment Fund and $7,196.00 for the Ct 2nd injury Funds.

We contribute over 90% of the cost of our employees health plan, because we feel it's an asset to keep our employees healthy.

Since we deal with large OEM’s like Sikorsky, Rolls, PW, Triumph in the state and out.... it's impossible to raise our pricing at the same rates that insurance has goes up. We need the state to help hold down those costs. As a manufacturer our Comp. mod rate in our type industry is always higher because of the nature of our hard work! And the Class we're in covers a small group, because not many of us are left. I would like to see how the state could promote some relief there.

All those high costs take away our ability to grow and support more jobs.
Now with the Affordable Health Care Act, employers like us with their own private health plans will have to contribute assessments to support the fund that protects insurers that run the Federal Affordable Health Care plans. So that law costs us even more again! It never seems to end!

At any given time, one of my employees may be covered under 3 different insurance plans—Workers Comp, Health, or Motor Vehicle Insurance.

When the State and Federal govt got into affordable health care, why couldn’t we have covered everyone with one plan 24 hours a day at work or at home—combining Health and Comp. It seems we have redundancy there, that hurts all us in the competition of the market place.

Mark Vecchiarelli
President
Yankee Casting Co., Inc.
243 Shaker Rd.
Enfield, CT 06082
Phone: (860) 749-6171
Fax: (860) 763-3342
website: <http://www.yankeecasting.com>
www.yankeecasting.com

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NextPart_001_0027_01CEE793.D16F63B0<
Thank you for the opportunity to comment on regulations that are duplicative. I have focused on the food service regulations in the CT Public Health Code.

Eloise Hazelwood

---
Eloise Hazelwood, RS, MPH
Director of Health
Town of Wallingford
203-294-2065
wlfdhealth@sbcglobal.net

----------000006070403000907050304<
I don't understand the need for a $250.00 per year Enterprise Tax on small businesses.

I'm a retired guy d/b/a Tribury Media, LLC to pick up some extra money for myself. My business makes only a few thousand dollars per year, between $2,500 and $5,000 gross.

By the time I pay my expenses and my state and federal income taxes, and fill out all the myriad forms - there is precious little profit. Out of that "profit" the State of Connecticut wants me to send them $250.00.

This is a real disincentive to me keeping the business alive. I'd be much better off doing my services cash and barter to avoid taxes.

I'm sure there are hundreds if not thousands of small entrepreneurs just like me. Isn't the State Income Tax enough?

--
*Terrence S. McAuliffe*
Owner, Tribury Media, LLC
30 Independence Circle
Middlebury, CT 06762
203-758-1492 Office
203-770-9744 Cell

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<table>
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| Shane Thibodeau    | Bridgeport| Energy and Environmental Protection, Dept Of                | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| John Hayes         | Meriden   | Energy and Environmental Protection, Dept Of                | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| James Bonnanzio    | Milford   | Energy and Environmental Protection, Dept Of                | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Eugene Flannigan| Middletown  | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Lisa M Martins  | BROOKLYN    | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Jonathan smart  | Waterbury   | Energy and Environmental Protection, Dept Of| carrying handguns in state forests  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>James Bernetich</td>
<td>Burlington</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Sunday Hunting restriction</td>
<td>11/26/2013</td>
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<tr>
<td>James Regan</td>
<td>Berlin</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Handguns in State Forests/Parks</td>
<td>11/26/2013</td>
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I feel that Hunting should be allowed on Sunday. Please review this regulation and explore the possibility of lifting this restriction.

Thank you for your considerations.
<table>
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<td>Jose Paul Magalhaes</td>
<td>Waterbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<td>Jesus Arce</td>
<td>Manchester</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying a hand gun in a state park</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Allen F. petri</td>
<td>Lyme</td>
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| Eric G. Koch       | Prospect | Energy and Environmental Protection, Dept Of    | Carrying handguns in St. For. & Pks        | 23-4-1(c) & 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Sheila M. Koch     | Prospect | Energy and Environmental Protection, Dept Of    | Carrying handguns in St. For. & Pks        | 23-4-1(c) & 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Daniel J. Stritch</td>
<td>Trumbull, CT</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>LOU CARPENTER</td>
<td>SHELTON</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Jon Northway</td>
<td>Cheshire</td>
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<td>prospect</td>
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<td>William Baker</td>
<td>West Hartford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carrying handguns in state forests</td>
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<tr>
<td>Matt Dziurgot</td>
<td>Wallingford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
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all of these new gun laws will not prevent another incident like in newtown from happening. law abiding citizens should be encouraged to carry instead of being made to feel like criminals. if anything makes sense it is expanding background checks and harsher penalties for gun based crimes. guns are not the problem people are the problem and stricter mental health regulations should be put into effect for those with existing conditions. to myself and many others this makes more sense than any other restrictions. the fact that these awful acts were carried out with fire arms is disturbing. at the same time if this individual was not able to get a hold of the guns his mother had he would have found a different means of attacking the school. i have also noticed that the term serial killer is not in the news as much any more. it seems that they have evolved from doing several incidents to just one major one. that is why mental health should get a bigger focus than any other aspect in this state let alone country.

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

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| Daniel Wrobel         | Colchester       | Energy and Environmental Protection, Dept Of State Forests | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| louis vuitton outlet  |                  | louis vuitton outlet                  | louis vuitton outlet               | No matter you is a welcome woman, a perfect woman, a strong female character or a female character for peace.                                                                                           |
| Alex Poulicakos | Energy and Environmental Protection, Dept Of | Carry in state forests | 23-4-1 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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<td>samantha robert</td>
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<td>Robert G Paris</td>
<td>Lebanon</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2</td>
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<td>Cheshire, CT</td>
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<td>Stephen Lotto</td>
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undesireable regulations

Please remove the "prevailing wage laws" and ALL requirements that unfairly increase the cost of doing business in this state. Help us to become more competitive in with other states and countries for added business and companies. Drop all laws that try to regulate the interaction of companies and unions. Eliminate requirements about mandatory arbitration. Try to take the government out of regulations hindering job growth. Reduce business taxes. When we have JOBS people will be able and willing to pay their fair share of taxes. Quit subsidizing things that are not economically viable such as electric cars and charging stations, solar cells on buildings. Severely restrict the DEEP ability to wreak havoc on companies for minor "problems" with insignificant spills. Limit response to spills of 100 gallons (not 1 drop in present law). Same with private citizens, no legal response to minor amounts (under 10 gallons per year). Eliminate wetlands commissions that unfairly limit ability of owners to utilize their property. Help us compete for MORE JOBS in this state. Bill Fuller, Bristol, CT.

Jason Cole
Stamford
Energy and Environmental Protection, Dept Of
Carrying handguns in State Forests
23-4-1(c) and 26-66-2
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| Richard M Allen | Plainfield       | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forests                                   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| David Nault | Bethel           | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests                                   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<td>Vernon</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>12/2/2013 6:23:45 PM</td>
</tr>
<tr>
<td>Mike Manzi</td>
<td>Harwinton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>12/2/2013 7:32:17 PM</td>
</tr>
<tr>
<td>George R Curry</td>
<td>New Haven</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2 Please alter the Regulations to permit men and women with Permits to Carry Pistols and Revolvers to carry a handgun for self-defense while in Connecticut Forests and Parks. Kindly, remove the prohibition on the 'Carrying of Firearms' in section 23-4-1(c) and include an exemption to 26-66-2 to allow the carrying of pistols and revolvers(including handguns utilizing center-fire ammunition)for the purposes of the GOD given right of self-defense.</td>
<td>12/2/2013 7:58:49 PM</td>
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<tr>
<td>Name</td>
<td>Location</td>
<td>Department</td>
<td>Issue</td>
<td>Proposed Changes</td>
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</tbody>
</table>
| Ralph Chappano| Avon           | Energy and Environmental Protection, Dept Of | Carrying Handguns in CT Forests/Pks | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
* Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the CT Agencies Regulations  
* Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense |
| Stephen J. Savino | Burlington | Governor's Office | Firearms carry in state forests | So this means someone hiking in the woods is not allowed to protect themselves from an animal attack. What is wrong with you people?? There has been an increase in wild animal encounters of late in residential areas. A Coyote walked through my yard just last week end. I would not go hiking in the woods without a means of protection. |
| Thomas Franek  | Wolcott        | Energy and Environmental Protection, Dept Of | Carrying handguns in state parks | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
* Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<th>Topic</th>
<th>Text</th>
<th>Date</th>
</tr>
</thead>
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| Jonathan van Ryzin    | Norwalk          | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/3/2013 |
| Ray Cote              |                  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/3/2013 |
| Daniel Battistini Jr  | Newington        | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<th>Details</th>
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</table>
| Fernando Solis    | East Hampton                    | Emergency Services and Public Protection, Dept Of   | Carrying handguns in State Forests                                           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Adam Kalinowski   | Norwalk                         | Emergency Services and Public Protection, Dept Of   | Carrying handguns in State Forests                                           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Sean Lassen       | Vernon                          | Energy and Environmental Protection, Dept Of       | Carrying handguns in State Forests                                           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |

Kind regards,  
Adam Kalinowski  

12/3/2013 4:00:47 PM
<table>
<thead>
<tr>
<th>Name</th>
<th>Agency</th>
<th>Topic</th>
<th>Section Numbers</th>
<th>Comment</th>
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</thead>
<tbody>
<tr>
<td>William Wolfe</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
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<td>12/3/2013 6:35:25 PM</td>
</tr>
<tr>
<td>T.M. Fitzgerald</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
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<td>12/3/2013 7:39:15 PM</td>
</tr>
<tr>
<td>JOHN BELLEAU</td>
<td>HAMDEN</td>
<td>CARRYING HANDGUNS IN STATE FORESTS</td>
<td>23-4-1(c) AND 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

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| Dave Johnson  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests    | 23-4-1(c) and 26-66-2                  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/3/2013 9:31:43 PM |
| Mike Young    | Danbury  | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2                  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/3/2013 9:54:10 PM |
| Michael Dalena| Plainville | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/3/2013 10:47:31 PM |
| Dennis Rae jr.| Colebrook | Emergency Services and Public Protection, Dept Of | Carry in state forest | Permit holders should be able to carry anywhere. | 12/4/2013 7:54:12 AM |
A stripping facility used to remove VOC from contaminated groundwater or soil with 95% control efficiency does not require an air permit. However, the definition of VOC, and hence this permit exemption, does not include perchloroethylene, a commonly stripped compound.

The definitions in 22a-174-1 include organic compounds, which would include perc, but the stripping facility exemption specifies VOC, not organic compounds.

Perchloroethylene (perc) is an organic compound that is commonly stripped from soil and water and is not a VOC. Other “organic compounds” that are not defined as VOCs, including methylene chloride, 1,1,1 trichloroethane, methylene-chloride, trichlorotrifluoroethane and many freons that were used in degreasers for metal cleaning, are also stripped from soil and water. Historical degreasing is a major reason that soil vapor extractors are used. Further, CT's definition of “stripping facility” uses the term “organic compounds”, but the permit exemption in 22a-174-3a(a)(2)(B)(ii) for stripping facilities uses the more restrictive term "VOC".

Thus, it follows that a permit should not be required for an exempt VOC soil stripping facility, when a permit exemption with requirements or permit by rule would suffice. A permit for such an operation would most likely have the same requirements as the permit exemption requirement of 95%.

It is also suggested that this exemption could be modified to include stripping of any organic compounds.
<table>
<thead>
<tr>
<th>Name</th>
<th>City</th>
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<th>Issue Description</th>
<th>Date</th>
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<tbody>
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<td>23-4-1(c) and 26-66-2</td>
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<td></td>
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<td></td>
<td>As A law abiding citizen for 58 years in my birth state of CT and a Pistol Permit holder for 40 years</td>
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<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</td>
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<td>- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations</td>
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<td>I am allowed to carry just about anywhere in the State but would be unable to defend myself, family or friends should we be encountered by a gang or other person or animal that meant us harm. Please consider this as common sense law</td>
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<tr>
<td></td>
<td></td>
<td></td>
<td>Sincerely,</td>
<td></td>
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<td></td>
<td></td>
<td></td>
<td>William Rahl</td>
<td></td>
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</tbody>
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<thead>
<tr>
<th>Chris Asetta</th>
<th>Norwalk</th>
<th>Energy and Environmental Protection, Dept Of</th>
<th>Carrying handguns in State Forests</th>
<th>12/4/2013</th>
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<tr>
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<td>23-4-1(c) and 26-66-2</td>
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<td>Department</td>
<td>Purpose</td>
<td>Specific Request</td>
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| Paul McVay      | Watertown| Energy and Environmental Protection, Dept Of    | Carrying handguns in state forests           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Richard Parmalee| Danbury  | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Tomothy Hawks   | Baltic   | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests           | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<td>William Moran</td>
<td>Bethlehem</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<td>David Pang</td>
<td>Westport</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<td>Victor Ribera</td>
<td>North Branford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>hand gun carrying in state forestan</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.
- I purposely do not use the state parks and forest because I cannot protect my self or my family. 4 legged creatures can be just as dangerous as 2 legged.

Please change this!!!!

this change would be especially helpful to women who could find themselves vulnerable to a larger male attacker.
<table>
<thead>
<tr>
<th>Name/Title</th>
<th>Location</th>
<th>Department/Agency</th>
<th>Scenario</th>
<th>Regulation References</th>
<th>Statement</th>
</tr>
</thead>
<tbody>
<tr>
<td>LaVan Norwood</td>
<td>Salem</td>
<td>Emergency Services and Public Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>I am deeply offended by your efforts to deny me the rights I served my country to protect! I full stand by the following statements. Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Brooke Cheney</td>
<td>Harwinton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carry in State Forests and Parks</td>
<td>23-4-1(c) and 26-66-2</td>
<td>I was with my two children 5&amp;6 years old, we were picking up trash in a CT state park. We were far from anyone we knew, but close to the access road. As a van drove by slowly I realized that as a lone woman with 2 small kids in the woods I had little or no options to defend myself or my kids. As a victim of violent crime I know it can happen in an instant. Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Jason         | Wallingford| Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/5/2013 11:15:58 PM |
| Robert Voytas | southport  | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/6/2013 7:17:22 AM |
<p>| John Eno      | Meriden    | Motor Vehicles Department                       | Suspended Liscense     | The time period to process suspended liscenses take way to long and it affects a lot of people if they take their time and when it comes to the suspension day being up and no word or anything from them about it | 12/6/2013 10:37:27 AM |</p>
<table>
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<th>Name</th>
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| Josh Cleveland |          | Energy and Environmental Protection, Dept Of | Carrying handguns in state forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/6/2013 12:22:10 PM |
| Laurence Styga | Tolland  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/6/2013 2:10:00 PM |
Dear Governor Malloy:

I would draw your attention to the twelve pages of regulations (Sections 7-170 to 7-185) currently regulating raffles, the five or more pages in the application packet, and the time it takes both at town hall and in the Department of Consumer Protection to process these applications. Could we not have a threshold prize value—perhaps just for nonprofit organizations—below which all this is unnecessary? Or a blanket permit for five years? The burden on our small churches, daycare centers, civic organizations is not insignificant, and there has to be better use of our state government employees’ time than reviewing these applications.

The raffle regulations are a small issue, but they reinforce the very negative impression local citizens have of the state government bureaucracy.

Thank you for your consideration.

Cathy

__________________________
Catherine Iino
First Selectwoman
Town of Killingworth

323 Route 81
Killingworth, Connecticut 06419

860-663-1765, ext. 501
860-301-1398 (cell)
To whom it may concern,

I would like to submit a Department of Motor Vehicles Regulation for review. The regulation deals with a "class 1A" driver's license. It appears that this is related to driving a tractor-trailer combination with 2 trailers.

I believe that currently a driver would need a Class "A" Commercial Drivers License with a "T" Endorsement for double and triple trailers. I believe the Class 1A license is obsolete and no longer issued.

Requirements for the Issuance of a Class 1A Operator’s License and Administrative Penalty for Operating a Commercial Vehicle Combination without Such License

Regulation 14-261a-1
Regulation 14-261a-2
Regulation 14-261a-3

Sincerely,

Corporal Brian Norko

Stratford Police Department

bnorko@townofstratford.com

203-385-4186

12/5/2013 3:37:52 PM
brownfields

MUST change law that the only way DEEP staff gets paid is when they signoff on projects. They have no clue how onerous the regs are and how much Brown field's stuff is nonsense. Its "normal" for simple clean-up jobs to take YEARS.

Thanks
Jon Brayshaw
First Selectman
Middlefield

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eileen costello
danburyEarly Childhood, Office of teacher qualifications

Please consider grandfathering language in the early childhood teacher qualifications. The number of people in the workforce is not sufficient enough to meet the new staff qualification mandate. There are also no additional funds to pay for the staff with higher degrees. School Readiness programs are at a tipping point. The mandates on higher quality, while necessary and supported by those in the field, are impossible to meet while being flat funded for 5+ years. These mandates are causing deficits in many of the programs. If we continue to mandate quality initiatives, we must also support an annual COLA to these programs and to the administration of the program.
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<th>Name</th>
<th>Town</th>
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<th>Issue</th>
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| Brendan Malone   | Suffield    | Energy and Environmental Protection, Dept Of    | Carrying handguns in state forests | 23-4-1(c) and 26-66-2 Please modify the state agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT state parks and forests. Specifically:  
- Remove the prohibition on 'carrying of firearms' in section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers(including handguns using centerfire ammunition) for the purposes of self defense. | 12/6/2013 4:22:58 PM |
| Juleen Flanigan  | Litchfield  | Developmental Services, Dept Of                 | parent fees                    | Birth to Three  
The CT Birth to Three program serves infants and toddlers with developmental delays. This program originates in the federal IDEA law. Within the last 10 years, the state of CT through DDS established a parent fee system for parents of infants and toddlers with developmental delays in order to generate more revenue for the program. Children who are eligible to receive services have significant delays in development. We continue to lose families in this system because the fee is too high. This defeats the intent of this program which is early identification of a developmental need in order to provide services that may improve their developmental level so they are not in need of the expensive preschool education services. Parents are required to allow their insurance plans to be billed for services and in addition need to pay a parent fee. This is counterproductive to the goal of the program. When children enter the public school system at the age of 3, parents are not required to pay a parent fee. So the policy is also not consistent with school policy. The parent fee is not a requirement of the federal law that governs this program and is counterproductive to helping children. | 12/6/2013 4:31:13 PM |
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<th>Name</th>
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| Nicholas Marsan | Norwalk       | Energy and Environmental Protection, Dept Of| handguns in State Forests/Parks | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Tim Jones       | Newington     | Energy and Environmental Protection, Dept Of| Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Sean B Cocola  | South Glastonbury | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Jean          | Energy and Environmental Protection, Dept Of | carrying handguns in state forests    | 23-4-1 (c) and 26-66-2       | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/7/2013 10:33:34 AM |
| Allen Riquier | CCDL, NRA                               | Governor's Office                      | Pistol carry in state parks  | I believe that legal concealed carry of hand guns should be allowed in state parks. I live on 11 acres of land surrounded by 2700 acres of state and federal land. I see no reason for not being allowed to carry. We have had dozens of people of questionable intent, including escaped convicts hiding out at Mansfield Hollow State Park. The good guys should be armed as well. | 12/7/2013 10:44:26 AM |
| Mike          | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests     | 23-4-1(c) and 26-66-2        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Name | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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|------|------------------------------------------|----------------------------------|----------------------|---------------------------------------------------------------------------------|---------------------|
| Gilda | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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<td>East Hampton</td>
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<td>Vincent Ackerman</td>
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<td>Preston</td>
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<td>West</td>
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<tr>
<td>Mark Hazzard</td>
<td>Terryville</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Firearms in State Parks and Forests</td>
<td>I would like to say I have spent much money on permits and training federal law says I have a right to carry in these places The second amendment clearly states I have a right to keep and bear arms why does the state of CT. feel they have the right to counter the Constitution of the United States?</td>
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| Eric Parent        | CCDL     | Ashford                                    | 23-4-1(c) and 26-66-2            | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |                     |
| John Hobden        | Enfield  | Energy and Environmental Protection, Dept Of | 3-4-1(c) and 26-66-2             | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/8/2013 8:44:59 PM |
| Lazarus Alperovich | Fairfield | Energy and Environmental Protection, Dept Of | 23-4-1(c) and 26-66-2            | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/8/2013 8:48:41 PM |
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| Kris Lingenfelter | Windsor Locks    | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/8/2013 8:53:17 PM |
| Charles Graffeo   | Bethel           | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests        | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/8/2013 8:55:50 PM |
<p>| Glenn Higney      | North Windham    | I don't know                                | Carrying a handgun in State Forests       | Explain to me why it is lawful for us as permit holder in Ct to be trusted by the State of. CT to carry a hand gun anywhere in the state except state land. Does the Gov think that we don't need protect on state land or that bad people don't hang around in state forests. I hike a lot of trails through the state and I've been confronted by some pretty bad looking people. If I can't carry in state forests and land I and my family will just stop using these areas for my family. Just one more reason to think about moving my family and business from this state. This used to be a great state to live in and it seems like we just keep getting pushed out. | 12/8/2013 9:00:09 PM |</p>
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| George Robinson | Plainfield | Energy and Environmental Protection, Dept Of | Modify State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/8/2013 9:08:53 PM |
| Anthony Perrelli | Ridgefield | Energy and Environmental Protection, Dept Of | Modify State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/8/2013 9:10:40 PM |
| Scott R. Despres | Meriden | Energy and Environmental Protection, Dept Of | Modify State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/8/2013 9:13:27 PM |
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| Jack Kavanaugh     | Groton   | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                                   | 12/8/2013 9:20:10 PM |
| Victor J. Strama   | Woodstock| Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                                   | 12/8/2013 9:28:21 PM |
| James S. Borbas    | Prospect | Energy and Environmental Protection, Dept Of    | Carrying handguns in State Forests         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the "carrying of firearms" in Section 23-4-1(c) of the Connecticut Agencies Regulations. Add an exception to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                                 | 12/8/2013 9:39:28 PM |
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<tr>
<td>Donald Gordon</td>
<td>Oakdale</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
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|                    |                       |                                                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| David Bartlett     | Montville             | Emergency Services and Public Protection, Dept Of | Carrying handguns in State Forests                                    | 23-4-1(c) and 26-66-2 | 12/8/2013 10:03:59 PM |
|                    |                       |                                                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |                |
| William Connole    |                       | Energy and Environmental Protection, Dept Of   | Carrying handguns in State Forests                                    | 23-4-1(c) and 26-66-2 | 12/8/2013 10:07:08 PM |
|                    |                       |                                                 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<th>Name</th>
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<th>Carrying Firearms in</th>
<th>Regulations</th>
<th>Proposal</th>
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<tbody>
<tr>
<td>Allen Gerard</td>
<td>Retired CT Police Officer</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please represent me as a law abiding citizen, tax payer and voter in the state of Connecticut and modify state regulations to allow individuals with valid Permits to Carry Pistols and Revolvers, to carry a handgun for self defense while in Connecticut State Parks and Forests. Rural areas such as Connecticut forests and parks are prime locations for violent criminals to pry on defenseless citizens. There hasn’t been any abundance of problems with law abiding pistol permit holder citizens carrying handguns for self defence in Connecticut forests and Parks to warrant this new restriction. Banning the good guy men and women will just serve as a green light for the criminal element to commit crimes of violence in these areas, now unchallenged. Specifically: - Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Michael Lathrop</td>
<td>Eastford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying Firearms in State parks</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the ‘carrying of firearms’ in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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| Ronald N. Saunders | East Haddam   | Energy and Environmental Protection, Dept Of | Carrying handguns in state Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Stephen Ricci   | North Haven   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| James Pecca      | Bethany       | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<tr>
<td>Andrew DelJoseph</td>
<td>Milford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulation to allow individuals with valid permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT Parks and Forest. Specifically remove the prohibition on the “carrying of firearms” in section23-4-(c) of the Connecticut Agencies Regulations. And an exception to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense.</td>
<td>12/8/2013 11:19:55 PM</td>
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| Charles D. Newell     | Pomfret Center | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/8/2013 11:32:40 PM |
| Oscar Manero          | Stamford | Energy and Environmental Protection, Dept Of    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<tr>
<td>Bill Gagnon</td>
<td>New London</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>12/9/2013 12:36:58 AM</td>
</tr>
<tr>
<td>James Scullyt</td>
<td>Eat Hartford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying guns in State Forests and 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>12/9/2013 6:39:52 AM</td>
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<tr>
<td>Bryan Arndt</td>
<td>Stratford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Norann Dillon</td>
<td>Revenue Services, Dept Of</td>
<td>The Bottle Bill</td>
<td>Section 22a-243</td>
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| Michael Habif         | Norwalk         | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  | 12/9/2013 7:07:54 AM |
| Joseph Sproviero      | easton          | Energy and Environmental Protection, Dept Of | carry handguns in state parks              | 23-4-1(c), 26-66-2  | Handgun permit holders have been fully vetted and should be able to carry in state parks and forests just like anywhere else | 12/9/2013 7:12:17 AM |
| Shane Delaney         | West Haven      | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense  | 12/9/2013 7:25:12 AM |
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<tr>
<td>Christopher Tolla</td>
<td>STAMFORD</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests Please modify the State Agencies Regulations to allow</td>
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<td>individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</td>
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<td>Joe Donahue</td>
<td>Thomaston</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carrying handguns in state forest Please remove the prohibition on the carrying of firearms in section 23-4-1[c]. Please add an exemption to 26-66-2 to allow the carry of pistols and revolvers [including handguns using center-fire ammunition] for the purposes or self defense. thank you</td>
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<td>Johnny Carrier</td>
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<td>Energy and Environmental Protection, Dept Of</td>
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<td>James Bills</td>
<td>East Hartford</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>John Swanson</td>
<td>East Granby</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>David LaPointe</td>
<td>Canterbury CT</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<tr>
<td>Alton Blodgett</td>
<td>Lebanon</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forests</td>
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<tr>
<td>Spencer</td>
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<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
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| David Lenihan      | Energy and Environmental Protection, Dept Of | Carryin handguns in state forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/9/2013 10:16:02 AM  |
| jeff a myshka      | oakdale              | Governor’s Office                  | Please modify the state agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defends while in Ct. state parks and forest specifically:  
  - Remove the prohibition on the the carry of firearms in section 23-4-1(c) of Ct. agencies regulations.  
  - Add an exemption to 26-66-2 allow the carrying of pistols and revolvers (including handguns using Center -fire ammunition) for the purposes of self defends. | 12/9/2013 10:26:36 AM  |
| Jeremy Hanson      | Southington          | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Michael Mayer | Bethlehem | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Thank You,  
Mike Mayer |
| Thomas J Gallagher | North Branford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
Carrying handguns in State Forests

As a Ct Pistol Permit holder, hiker, hunter, fisherman and senior citizen, I feel it should be my right if I choose, to legally carry a hand gun in the CT state forests and some state parks for personal protection.

While open carry is legal in CT in certain areas and under certain conditions, I agree and concede the proper method of carry in State parks and State Forests should be concealed, so as not to alarm others in the area.

While I see no need for a hand gun at state parks such as Hamonasset, or other beaches, parks and picnic areas frequented by families, I feel it is viable in CT’s State Forests and rural undeveloped parks such Salmon River and Horse Pond and the like.

I like to hike hunt and fish, and do so mostly alone.

I have encountered and been approached by individuals and groups of individuals in the Mashomesc State Forest whose activities were/are somewhat questionable.

Luckily, my body language demonstrated I wanted nothing to do with them, but as a lone senior citizen I did feel very uncomfortable at the time.

If Ct citizens are properly licensed and permited, I can see no reason to restrict the carrying of a hand gun for personal protection in these areas.

I do not, and will not condone any recreational shooting in these State Forest areas, but I see personal protection as being needed.

Thank you for the opportunity to express my views. I await your response and decision on this matter.

Thomas Smith
182 Evergreen Road
Cromwell, CT 06416
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<tr>
<th>Name</th>
<th>Location</th>
<th>Agency</th>
<th>Issue Description</th>
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<tr>
<td>Emma P. Canas-Strama</td>
<td>Woodstock</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forest 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Bruce Wagner</td>
<td>Shelton</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>12/9/2013 11:43:10 AM</td>
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<tr>
<td>Paul J Dejohn</td>
<td>Wethersfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying hand guns in State Forest 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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</table>
| Matthew LaFayette     | Meriden        | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests                                    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/9/2013 11:59:20 AM |
| Edward J Menard       | Windsor        | Emergency Services and Public Protection, Dept Of | Carrying handguns in State Forests                                    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/9/2013 12:14:33 PM |
| Zane Dargaty          |                | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests                                    | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/9/2013 12:43:57 PM |
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<tbody>
<tr>
<td>Angelo Fiducia</td>
<td>Berlin</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forest</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to carry pistols and revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: Remove the prohibition on the 'carrying of firearms' in section 23-4-1 (c) of the Connecticut Agencies Regulations. Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
</tr>
<tr>
<td>John Lubinski</td>
<td>beacon falls</td>
<td>Governor's Office</td>
<td>right to carry in state forests</td>
<td>Dear Governor Malloy, we the people that are pistol permit holders should while hiking in our state forests be able to carry a side arm for protection, for ourself and others that are with the permit holder while using the forests. there are so many predators out there such as bears, coyotes, mountain lions yes I said mountain lions they are out there, if you walk up on any one of these animals and they are with there young there could be an accident waiting to happen thank you for your time John</td>
</tr>
</tbody>
</table>
| William Morey | New London   | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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| Brian Van Damme |                | Energy and Environmental Protection, Dept Of 6   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/9/2013 1:31:59 PM       |
| Michael McJunkins | New London     | Energy and Environmental Protection, Dept Of 6  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/9/2013 1:36:46 PM       |
| Joseph DeLuca   | Torrington     | Energy and Environmental Protection, Dept Of 6  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/9/2013 2:07:15 PM       |
| Craig Ingalls | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |

| Corine Hellerman | Energy and Environmental Protection, Dept Of | Operation of emergency engines | 22a-174-3b, 22 | As evidenced by DEEP's presentation material on p. 11 here: http://www.ct.gov/deep/lib/deep/air/siprac/2011/rice_neshap.pdf, emergency engines are subject to CT's requirements, which are very different, and sometimes in conflict, with EPA's requirements under 40 CFR 63, Subpart 4Z NESHAP. Specifically, the two agencies define emergency differently and allow operation under differing circumstances.

Regulatory burden would be greatly reduced if CT adopted the EPA requirements, as well as EPA's white paper, which acknowledges that emergency generators typically do not operate much, and uses 500 hours per year to calculate potential emissions. Many states use this guidance. This would be prudent, especially in light of the recent amnesty letters issued by CT DEEP for operating emergency generators during storm events. http://www.epa.gov/ttn/oarpg/ts5/memoranda/emgen.pdf |
<table>
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<tr>
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<tbody>
<tr>
<td>Pedro Ferrer</td>
<td>southbury</td>
<td>Governor's Office</td>
<td>Right to carry in State Parks</td>
<td>As law abiding citizens it is a shame that for our own protection after having gone through training, paying all license fees and registrations we as rightful pistol permit license holders cannot enjoy the same freedom and safety and ability to protect ourselves and loved ones in a state park. This is a suggestion to change and or amend the law as asked by GOV.D. Malloy</td>
<td>12/9/2013 2:54:31 PM</td>
</tr>
<tr>
<td>AL SEPTEMBER</td>
<td>TORRINGTON</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>12/9/2013 3:07:19 PM</td>
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</table>
| glynis simmons | meriden   | Energy and Environmental Protection, Dept Of | carrying hand guns in state forests       | 23-4-1c and 26-66-2 | to whom it may concern:  
|               |           |                                             |                                             |         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
|               |           |                                             |                                             |         | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
|               |           |                                             |                                             |         | - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| James Laviana | Waterbury | Governor's Office                           | Carrying hand guns in state forests        |         | I think that law abiding citizens, with the proper permits, should be allowed to carry hand guns in our state parks and forests. |
| Robert Mattson | Newington | Energy and Environmental Protection, Dept Of | Carry handguns in State Forests            | 23-4-1(c) & 26-662 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
|               |           |                                             |                                             |         | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
|               |           |                                             |                                             |         | - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |

12/9/2013 3:19:55 PM

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12/9/2013 3:50:00 PM
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| Chad Mason     | Stafford Spg. | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense |
| Joseph Phillips| Southington | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests.  
CT Pistol Permit holders go through training, background checks and pay a lot of money to obtain these permits. The CT constitution recognizes the citizen's right to self defense. It states, “Every citizen has a right to bear arms in defense of himself [or herself] and the state” (Art. I, § 15).  
Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
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</table>
| Ralph T. DeAngelo | Torrington    | Energy and Environmental Protection, Dept Of Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forests                                   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/9/2013 5:11:11 PM |
| Rick Wiese      | Colchester    | Energy and Environmental Protection, Dept Of Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests                                   | Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/9/2013 5:21:49 PM |
| Jeffrey Beebe   | East Lyme     | Energy and Environmental Protection, Dept Of Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests                                   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<tbody>
<tr>
<td>Bill Hodge Jr</td>
<td>Vernon</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:&lt;br&gt;- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations&lt;br&gt;- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Chris DeCarlo</td>
<td>Wallingford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
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<tr>
<td>Name</td>
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| Jack Kuenzle       | Roxbury    | Energy and Environmental Protection, Dept Of | Carrying firearms in State Forests         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.  
Citizens in the state of Connecticut have the right to carry concealed firearms, and state parks and forests should be part of the permitted regions to do so. It is in parks and forests that that many citizens face threats of secluded areas and wild animals, where the danger is high and the need to be able to carry a firearm in equally so. Please reform the law to allow civilians to properly and fully exercise their rights. | 12/9/2013 7:13:45 PM |
| yolanda verneris    | hamden     | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/9/2013 7:22:34 PM |
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<th>Organization</th>
<th>Purpose</th>
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<th>Date/Time</th>
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<tr>
<td>Charles J. Roberts</td>
<td>Oakdale</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</td>
<td>12/9/2013 8:00:30 PM</td>
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|                       |                |                                            | 23-4-1(c) and 26-66-2                                                  | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                  |                                                                              |
| Nancy Devine          | Southbury      | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forests                                     | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:                                                                                       | 12/9/2013 8:06:21 PM          |
|                       |                |                                            | 23-4-1(c) and 26-66-2                                                  | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                  |                                                                              |
| Christopher Torino    | Bristol Fish and Game Association | West Hartford | Energy and Environmental Protection, Dept Of | Carrying Handguns in ST Frsts &Prks                                      | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:                                                                                       | 12/9/2013 9:03:59 PM          |
|                       |                |                                            | 23-4-1(c)  26-66-2                                                      | - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.                                                  |                                                                              |
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<tbody>
<tr>
<td>Jonathan Nadeau</td>
<td>Plantsville</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</td>
<td>12/9/2013 9:26:18 PM</td>
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<td>23-4-1 (c) &amp; 26-66-2</td>
<td>- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations</td>
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<tr>
<td>Peter Lewin</td>
<td>Salisbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in state forests a</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</td>
<td>12/9/2013 9:58:59 PM</td>
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<td>- Remove the prohibition on &quot;the carry of firearms&quot; in section 23-4-1(c) of the Connecticut agencies regulations.</td>
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<td>- Add an exemption to 26-66-2 to allow the carry of pistols and revolvers (including handguns using center fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>West Hubbard</td>
<td>Greenwich</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</td>
<td>12/10/2013 4:43:51 AM</td>
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<td>Governor Malloy, if you really do support the 2nd Amendment and our own state constitution, I ask you to push for these changes and stand with law abiding gun owners.</td>
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<td>Name</td>
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<td>Keith Tubman</td>
<td>Westbrook</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>12/10/2013</td>
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<td>Please modify the State Agencies Regulations to allow individuals with</td>
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<td>valid Permits to Carry Pistols and Revolvers to carry a handgun for</td>
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<td>self defense while in CT State Parks and Forests. Specifically:</td>
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<td>- Remove the prohibition on the 'carrying of firearms' in Section</td>
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<td>- Add an exemption to 26-66-2 to allow the carrying of pistols</td>
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<td>and revolvers (including handguns using center-fire ammunition)</td>
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<td>for the purposes of self defense.</td>
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<td>George Chaber</td>
<td>Brookfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carry of pistols &amp; revolvers in park</td>
<td>12/10/2013</td>
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<td>23-4-1(c),22-66-2</td>
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<td>Please modify the state regulations to allow individuals with valid</td>
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<td>permits to carry pistols and revolvers to carry handguns for self</td>
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<td>defense while in Connecticut state parks and forests.</td>
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<td>David A Dojnia</td>
<td>Ansonia</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying hand guns in state forests</td>
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<td>Please modify the State Agencies Regulations to allow individuals</td>
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<td>with valid Permits to Carry Pistols and Revolvers to carry a</td>
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<td>handgun for self defense while in CT State Parks and Forests.</td>
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<td>Specifically:</td>
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<td>- Remove the prohibition on the 'carrying of firearms' in Section</td>
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<td>and revolvers (including handguns using center-fire ammunition)</td>
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<td>for the purposes of self defense.</td>
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Dear Governor Malloy,

Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.

Thank you,
Matthew Szydlo,
Citizen, Eagle Scout, Small Business Owner

12/10/2013 10:49:50 AM
Dear Governor Malloy:

The Minimum Budget Requirement (MBR) - a statutory mandate that each town appropriate at least the same amount for education as it did the previous year. The MBR, and its predecessor the Minimum Expenditure Requirement (MER), were originally intended to be companions to ECS that would require towns to spend at least the foundation amount for each student. However, with the foundation remaining virtually flat over the years, minimum spending evolved into a requirement for towns to commit all or most new ECS aid they receive to local education budgets. Eventually any connection to per pupil spending or the foundation ceased to exist.

After attending the first budget meeting in the town of Redding last week, I felt absolutely compelled to send you an email on the MBR as noted above. According to the Superintendent, the taxpayers of Redding may have to continue spending money on school personnel both certified and non certified because of this mandate unnecessarily. I am quite certain that
you are aware of the decline in enrollment in a majority of the small towns as is the population moving into Connecticut. For example, five years ago the total number of students per grade at Redding Elementary School were 168, 156, 147 and 134. The projected enrollment for 2014-15 is 68, 84, 93 and 80. Do these numbers suggest a decrease in staff from 5 years ago. Of course it does, but because of the MBR mandate the taxpayers will NOT be allowed to correlate the size of enrollment to the size of teaching staff. This is inexcusable. The taxpayers of Redding are already suffering financially from overly high taxes. As is many of the towns around us who are engaged in the same battle with declining enrollment.

I understand this mandate was put in place to make sure that the quality of education did not decline year after year, but now that we have different factors weighing heavily on the core of this mandate it is time for a change. At the very least, the smaller towns in CT should be given a waiver to allow them to pursue a budget that accurately reflects the change in enrollment while still maintaining the highest quality of education. If this leads to a negative budget at one or more schools than it should be allowed to proceed. If The Federal Government can allowed waivers out of NCLB by the states, than the municipalities of CT should be
allowed a waiver out of MBR.

Declining enrollment is a serious issue in the coming years. The new projected enrollment figures from the professional consultants is grim. Small towns such as Redding simply cannot continue to sustain the fiscal responsibility in maintaining a budget with excess staff simply because of a piece of legislation put in place years ago that never took into account the variable of declining enrollment.

Staffing levels at each and every school in CT must be allowed to match the student population.

Please forward this email to the appropriate department in charge of making changes and or amendments to state legislation. This mandate needs immediate attention at all levels. We cannot continue to burden the taxpayers of CT with outdated legislation.

Thank you for your support in this matter.

Sincerely,
Dana A. Grey
<mailto:Greyda@optonline.net> Greyda@optonline.net

Cc: T. Boucher
   J. Himes

--Boundary_({ID_VapKbOx7Uweop19zB8ZxUQ})<
Dear Governor Malloy:

The Minimum Budget Requirement (MBR) =E2=80=93 a statutory mandate that each town appropriate at least the same amount for education as it did the previous year. The MBR, and its predecessor the Minimum Expenditure Requirement (MER), were originally intended to be companions to ECS that would require towns to spend at least the foundation amount for each student. However, with the foundation remaining virtually flat over the years, minimum spending evolved into a requirement for towns to commit all or most new ECS aid they receive to local education budgets. Eventually any connection to per pupil spending or the foundation ceased to exist.

I was prompted to write to you by an article I saw on a local blog for Redding, CT. I worry sometimes that Redding gets dismissed because it is perceived as a well-running, wealthy town. Nothing could be further from the truth. Many residents of Redding, CT feel undermined by its Board of Education. The combination of continuing job loss and poor real estate sales has obviously also affected our school population. Where grade sizes were once strong at 130 - 150 students, we have been told that
current projections puts us around the 80 range for 2014 and possibly 2015. At a recent Board of Ed meeting, our superintendent conveniently forgot to bring the projections that were provided to him by the State of CT. When pressed as to how he would modify the budget to address the decrease in students, it sounded as MBR is being used as a veil to protect all of his employees. Redding Public Schools is the biggest business operation in our town. We are overstaffed, plain and simple. There just doesn't seem to be any regard as to how it affects the taxpayer. Furthermore, even with this layer of pork I'm not so sure there is evidence of Redding students being superior readers and experts in mathematics. Long story short - PLEASE amend the MBR so that it makes sense to make substantial cuts when the student population is dramatically decreased. There just can't be a blanket rule when such severe changes are occurring at the town level. I have cc'd Mr. Genovesi, State Senator Boucher's legislative aide, I will also forward this letter to Senator Boucher and Congressman Jim Himes via their website. Thank you for the opportunity to express my concern. Very truly yours, RoseMarie Savino Gerschwer

--Boundary_...
Governor Malloy,

How about we cut to the chase and cut the public service work force and the programs the work on by 25%. That would put it all back where we were several years ago and we'll certainly all be able to survive that......

Bob MacGuffie
203-727-7798

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This email is free from viruses and malware because avast! Antivirus protection is active.
http://www.avast.com

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<table>
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<tr>
<th>Name</th>
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<th>Department</th>
<th>Issue</th>
<th>Request</th>
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</table>
| John J Canning  | Wallingford  | Energy and Environmental Protection, Dept Of | carrying handguns in State Parks          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Jeffery J Forte | Thomaston    | Energy and Environmental Protection, Dept Of | carrying handguns in state forests        | Please modify the states agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in state parks and forests specifically:  
- remove the prohibition of carrying of firearms in section 23-4-1(c) of the state agencies regulations  
- add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including pistols with center fire ammunition) for the purpose of self defense |
| Daniel Bassett  | Meriden      | Energy and Environmental Protection, Dept Of | carrying handguns in state parks          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
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<th>Name</th>
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<th>Regulation Details</th>
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</table>
| Mark Trotochaud  | Oakdale  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/11/2013 8:47:24 AM |

| Robert Kwasnicki | Enfield  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/11/2013 10:18:36 AM |
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<th>Issue/Request</th>
<th>Section/Reference</th>
<th>Date/Time</th>
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<tbody>
<tr>
<td>Jason Jakubowski</td>
<td>Hospital for Special Care, New Britain</td>
<td>Hospital for Special Care is requesting a wording change so that Sec. 19-13-D5 coincides with the record retention requirements in Sec. 19-13-D3 (acute care hospitals). The change would shift record retention at chronic disease hospitals from 25 years to 10 years, which is consistent with all other hospitals in CT. We believe this was merely a technical oversight, though a rather burdensome and expensive one from our perspective.</td>
<td>19-13-D5(d)(4)</td>
<td>12/11/2013 10:28:38 AM</td>
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<tr>
<td>Joseph Salemi</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Please modify the state regulations to allow licensed concealed carriers to carry for self protection in State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>23-4-1(c) and 26-66-2</td>
<td>12/11/2013 11:50:19 AM</td>
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<td>Name</td>
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| Brian Gauthier | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/11/2013 12:02:48 PM |
| David Combs | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/11/2013 12:14:38 PM |
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<tr>
<td>Jeff Yale</td>
<td>Meriden</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>12/11/2013</td>
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<td>23-4-1(c) and 26-66-2</td>
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<td>It is currently a violation of state regulations to carry a firearm</td>
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<td>for personal protection in state parks and state forests. Pistol</td>
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<td>Permit holders go through training, background checks and pay</td>
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<td>a lot of money to obtain these permits.</td>
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<td>Please modify the State Agencies Regulations to allow individuals</td>
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<td>with valid Permits to Carry Pistols and Revolvers to</td>
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<td>carry a handgun for self defense while in CT State Parks and</td>
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<td>Forests. Specifically:</td>
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<td>- Remove the prohibition on the 'carrying of firearms' in Section</td>
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<td>and revolvers (including handguns using center-fire ammunition)</td>
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<td>for the purposes of self defense.</td>
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<td>23-4-1(c) and 26-66-2</td>
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<td>I am a MA resident who holds a CT pistol permit.</td>
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<td>Please modify the State Agencies Regulations to allow individuals</td>
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| Jeremy Hubbard | Naugatuck  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/11/2013 12:56:07 PM |
| Lee Letourneau | West Haven | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/11/2013 1:28:03 PM |
| Zachery Neville | Avon | Energy and Environmental Protection, Dept Of | Carrying handguns in state parks | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<th>Issue</th>
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<td>James Duffy</td>
<td>Stratford</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>12/11/2013</td>
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<tr>
<td>Jonathan Varnet</td>
<td>Enfield</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Firearms in state forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>12/11/2013</td>
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<tr>
<td>Christina Taylor</td>
<td>Meriden</td>
<td>I don't know</td>
<td>Carrying handguns in State Forests</td>
<td>Considering the amount of homeless people that are adding up, I'd like the right to carry a firearm in state (and town) forests whenever I can. I understand not all homeless people are criminals but people can get desperate in times of great need. Thank you for your time and consideration.</td>
<td>12/11/2013</td>
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<td>Christina Taylor</td>
<td>Meriden</td>
<td>I don't know</td>
<td>Carrying handguns in State Forests</td>
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<td>Name</td>
<td>Organization</td>
<td>Action</td>
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<td>Rob LeMay</td>
<td>Fairfield Emergency Services and Public Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</td>
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<td>- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations</td>
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<td>- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Richard D. Kelley</td>
<td>CCDL</td>
<td>Carring handguns in state forest and Environmental Protection, Dept Of</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers, to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</td>
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<tr>
<td>Nicholas Vissicchio</td>
<td>CCDL</td>
<td>Derby Energy and Environmental Protection, Dept Of</td>
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<td>Carrying handguns in State Forests</td>
<td>- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations</td>
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<tr>
<td>Jeffrey Burns</td>
<td>Charlestown, Rhode Island</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Sean Cassano</td>
<td>Columbia</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>23-4-1(c) and 26-66-2</td>
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</tr>
<tr>
<td>Christine Ladd</td>
<td>Education, Dept Of</td>
<td>TeacherEvals</td>
<td></td>
<td></td>
<td>Stop using student test scores to evaluate teachers. It is unethical, invalid, and unreliable.</td>
</tr>
<tr>
<td>Bill Williams</td>
<td>Cheshire</td>
<td>I don't know</td>
<td>Carrying firearms in state forests</td>
<td>23-4-1(c)</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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</table>
| Nicholas Astorino | Wallingford | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/12/2013 7:39:44 AM |
| Daniel McGinn | Abington | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/12/2013 10:42:18 AM |
| Maurice Remillard Jr | Danielson | Energy and Environmental Protection, Dept Of | Carrying Handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:

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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/12/2013 11:03:32 AM |
| Cathy Suchenski | Social Services, Dept Of Public Relations | Dorothy L. moved to CT from RI during July. We immediately applied for Title XIX, SNAP and the Medicare Savings Plans all of which she had in RI. She says it took a matter of weeks to get approved there. She has not heard anything on any of the 3 programs. She’s told medical providers that Title XIX is pending but now she has a collection agency notice from Hunters’ Ambulance. My call to the Call Center this morning confirmed they have it in the system (including 5 years of back bank records) but no action has been taken. I was told it would be referred to the New Britain Regional Manager. I asked for a name and a phone # there but was denied. My name and phone # were taken hours ago but no call has been received. Isn’t there a 45 day limit to make a Title XIX decision? She hasn’t received any acknowledgement, not even a request for more info. |
| Elizabeth Drysdale | Waterbury Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests 23-4-1(c) and 26-66-2 Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
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<tr>
<th>Name</th>
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<th>Issue</th>
<th>Action</th>
<th>Date/Time</th>
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</table>
| Brian Snider | Waterbury  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/12/2013 1:13:06 PM |
| Kit Drysdale | Waterbury  | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests          | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/12/2013 1:14:51 PM |
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<th>Date</th>
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</table>
| Patrick Crean       | Energy and Environmental Protection, Dept Of| Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/12/2013 |
| Dave Mastrianna     | Energy and Environmental Protection, Dept Of| Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<tr>
<th>Name</th>
<th>Department</th>
<th>Topic</th>
<th>Supporting Regulations</th>
<th>Proposed Change</th>
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</table>
| Kevin Deangelis | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| Jim Burns     | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests         | 23-4-1(c) and 26-66-2  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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| Jon-Paul Mucha       | Coventry    | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/12/2013    |
| Floyd Baranello      | South Windsor | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/12/2013    |
| Scott Rainey         | Plainfield  | Energy and Environmental Protection, Dept Of | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
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<tr>
<th>Name</th>
<th>Comments</th>
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<tr>
<td>Michael H. Kissel</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>Carrying handguns in State Forests 23-4-1(c) and 26-66-2</td>
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<tr>
<td>Gina Arena</td>
<td>I don't know</td>
<td>Alcohol - legal drinking age</td>
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<td>I know the reason for the drinking age to be 21 is because of federal funding, but I think it's ridiculous that young adults are not allowed to legally drink until age 21. I am a high school teacher and a parent of teens. Instead of preventing underage drinking, the law causes teens and young adults to binge drink before going out or getting drunk in basements, unsupervised. When you, Governor Malloy, and I, were young adults, the drinking age was 18, (in my case, changed to 19) and I think I was a lot safer in a bar, pub or other public place where there were adults around serving or bouncers. In public, we were more likely not to get drunk and out of hand for fear of embarassment and humiliation. Plus, the cost of drinking in a bar also restricted the number of drinks we consumed. The other result of the higher drinking age that I see is that teens and young adults are turning to marijuana and synthetic drugs which are easier to get than alcohol. I’m sure the number of deaths on the road has decreased since the drinking age was raised, but I also think it’s because the state has improved on educating young adults on the dangers of drinking and driving. Kids are still drinking. Let’s put it out in the open where we can monitor it.</td>
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| David Romajas | Southington | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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<tr>
<th>CT Assn. of Health Care Facilities</th>
<th>On behalf of member facilities</th>
<th>East Hartford Public Health, Dept Of</th>
<th>Public Health Code 19-13-D8t et seq.</th>
<th>COMMENT ONE</th>
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<td>Department of Public Health</td>
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<td>Action Sought:</td>
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<td>Grant the commissioner the power to deem any regulatory requirement as no longer consistent with the current standards of care and exempt facilities from further compliance without the need for each individual facility to seek a waiver.</td>
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<td>Reason:</td>
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<td>Because standards of care change more frequently than regulations, if the Department determines that a particular requirement is no longer necessary, the process for exempting compliance could be streamlined by granting the commissioner the authority to automatically waive further compliance. As an example of how the current system is highly inefficient, the Department recently sent a blast fax to providers explaining that an annual urinalysis required by §19-13-D8t(n)(8)(B)(ii) is “no longer consistent with current standards of care.” Because the regulation requires the urinalysis, however, providers must file for a waiver of the requirement and include detailed information as to why such a waiver is warranted. Moreover, the Department must spend the time and effort to review the requested waiver, ensure that all appropriate information and respond to the provider.</td>
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<td>COMMENT TWO</td>
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</table>
Relevant Agency:
Department of Public Health

Action Sought:
Update statutory references by amending reference to Connecticut General Statutes Sections 19-576 through 19-586 to “Sections 19a-491 et seq.”

Reason:
Statutes currently referenced in regulations have been transferred and/or repealed.

COMMENT THREE
Regulation:
19-13-D8t(d)(3)(A)

Relevant Agency:
Department of Public Health

Action Sought:
Amend the language regarding identification bracelets to be consistent with federal regulations and requirements for rest homes with nursing supervision and requiring instead “A method for identification of all patients at all times shall be established by each chronic and convalescent home.”

Reason:
In many facilities, identification bracelets are not safe or appropriate for certain residents, e.g., dementia residents who may find them agitating or who repeatedly remove them. Requiring identification bracelets for all residents creates an
in institutional feel contrary to the shift towards culture change. Federal regulations do not impose a requirement for identification bracelets and alternatives should be permitted to be implemented so long as the facility develops a method of identifying all patients.

COMMENT FOUR

Regulation:

19-13-D8t(f)(3)(I)

Relevant Agency:

Department of Public Health

Action Sought:

Amend language requiring “submission within 72 hours of reports on all accidents, or incidents, and any unusual or suspicious deaths in connection with subsection (g) of these regulations” to state “submission of reports on all reportable events in accordance with subsection (g) of these regulations...”

Reason:

The current language in the regulation is contrary to actual reporting requirements set forth in subsection (g) and may result in confusion. Not all incidents require a report within 72 hours. Class E incidents are maintained by the facility and are not submitted to the Department. Class A,B, and C incidents must be immediately reported by telephone to the Department with a written report within 72 hours. Amending the language to refer to the specific requirements in subsection (g) eliminates any potential for confusion.

COMMENT FIVE

Regulation:
Relevant Agency:
Department of Public Health

Action Sought:
Delete the requirement for review of all reportable events by the administrator and director of nurses on a monthly basis.

Reason:
Review of reportable events is routinely performed by the QA committee. The administrator and DNS already review and sign all reportable events prior to submission. Requiring monthly review by the Administrator and DNS is unnecessarily burdensome.

COMMENT SIX
Regulation:
19-13-D8t(g)(5)

Relevant Agency:
Department of Public Health

Action Sought:
Reduce the number of physicians on the medical staff from three to one in addition to the medical director.

Reason:
In many facilities, the medical director also serves as the attending physician for many of the residents. As a result, it is often difficult to have three physicians on the medical staff and any such requirement is unnecessarily burdensome.
COMMENT SEVEN

Regulation: 19-13-D8t(i)(4)(A)

Relevant Agency: Department of Public Health

Action Sought: Revision – Reduce the frequency with which the medical staff must meet from at least once every 90 days to at least once every 120 days.

Reason: It is unnecessarily burdensome to require the medical staff to meet with such frequency. Issues of patient care, medical quality of care and interdisciplinary care issues can be effectively addressed with meetings every 120 days.

COMMENT EIGHT

Regulation: 19-13-D8t(j)(4)

Relevant Agency: Department of Public Health

Action Sought: Revision – “An assistant director of nurses shall be appointed in any facility of one hundred and fifty (150) beds or more.”

Reason:
The current requirement that an assistant director of nurses ("ADNS") shall be appointed in facilities with 120 beds or more is unnecessarily burdensome on nursing facilities. The primary duties performed by ADNSs in facilities with a licensed capacity of 120 to 149 beds are administrative in nature (e.g. staff scheduling), which could be performed by other staff. The ADNS is not counted as direct care staff (19-13-D8t(m)(8)), therefore, the proposed revision will not impact the required number of direct care staff and would save facilities from the expense of having a full-time registered nurse on staff where clinical involvement is limited. Patient care would not be impacted. The current requirement imposes unnecessary expense on facilities and should be revised.

COMMENT NINE

Regulation:

19-13-D8t(l)(1)(H)

Relevant Agency:
Department of Public Health

Action Sought:

Revision – Require that a placement agency or nursing pool that supplies a nurse aide to a facility verify nurse aide credentials instead of the facility.

Reason:

Facilities pay a premium to use placement agencies or nursing pools for staffing needs. The cost of using those organizations necessarily includes the administrative burden of verifying qualifications. As a result, it is unnecessarily burdensome to require the facility to perform the verification.
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<th>Regulation:</th>
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<tr>
<td>19-13-D8t(n)(1)</td>
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</table>

**Relevant Agency:**

Department of Public Health

**Action Sought:**

Revision – allow for comprehensive medical history and medical examination to be completed within 48 hours of admission, excluding weekends and holidays.

**Reason:**

Requiring physicians to make visits to complete the medical history and examination within 48 hours is unnecessarily burdensome where those 48 hours fall over a weekend or holiday. Excluding weekends and holidays provides flexibility without jeopardizing quality care.

**COMMENT ELEVEN**

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<th>Regulation:</th>
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</table>

**Relevant Agency:**

Department of Public Health

**Action Sought:**

Revision – Remove the specific list of tests and procedures that must be performed within 30 days of the resident’s admission and replace with: "Test and procedures determined to be necessary by the Department in conjunction with a work group that includes long-term care providers shall be performed and
the results recorded in the patient’s medical record by the
decision within thirty (30) days after the patient’s admission. The
Department shall ensure that a listing of such tests and
procedures are revised no less frequently than every three
years.”

Reason:

These regulations were created nearly twenty years ago and
have been amended or updated infrequently. Currently, this
specific section requires the performance of specific tests
without regard for whether requiring such tests is within the
standard of care. Changes in standards of care occur with far
more frequency than updates to regulations. As a result, it is
rarely advisable to have specific tests or other services dictated
by regulation because the regulation will quickly become
outdated.

In this instance, adherence to a specific list of tests either
subjects patients to unnecessary tests or omits others that may
be necessary. Instead of having a regulation that specifically
prescribes tests to be performed, the regulation should require
any tests within 30 days of admission that are deemed necessary
by the Department in consultation with long-term care
physicians. The regulation should require that such listing of test
be updated on a regular basis.

Regulations like this one, which quickly become outdated,
necessarily are ineffective and unduly burdensome. For
example, the Department recently sent a blast fax to providers
explaining that an annual urinalysis required by §19-13-
D8t(n)(8)(B)(ii) is “no longer consistent with current standar
dard of care.” Because the regulation requires the urinalysis, however,
providers must file for a waiver of the requirement and include
detailed information as to why such a waiver is warranted.
Moreover, the Department must spend the time and effort to
review the requested waiver, ensure that all appropriate
information and respond to the provider.

COMMENT TWELVE
Relevant Agency:
Department of Public Health

Action Sought:
Revision – “Each patient in a chronic and convalescent nursing home shall be examined by his/her personal physician at least once every thirty (30) days for the first ninety (90) days following admission and at least once every 60 days thereafter.”

Reason:
According to the current regulation, if the physician believes that the patient’s condition does not necessitate visits at 30 day intervals after the first 90 days, visits can be every 60 days provided that the physician provided justification for his/her determination in the medical record. Such a requirement is unnecessarily burdensome and inconsistent with the federal standard. The proposed language reflects the federal standard. The additional documentation requirement creates additional and unnecessary requirements for physicians. If a physician believes that more frequent visits are necessitated, he or she will order such visits. Requiring the physician to document that more frequent visits are not required is unnecessary.

COMMENT THIRTEEN

Relevant Agency:
Department of Public Health
Action Sought:

Revision – Remove the specific list of services that must be provided to patients and replace: “The facility shall provide professional services to each patient as determined to be necessary by the Department in conjunction with a work group that includes long-term care providers. A listing of those services and the frequency with which they are to be performed shall be revised no less frequently than every three years.”

Reason:

These regulations were created nearly twenty years ago and have been amended or updated infrequently. Currently, this specific section requires the performance of specific professional services without regard for whether providing such services is within the standard of care. Changes in standards of care occur with far more frequency than updates to regulations. As a result, it is rarely advisable to have specific tests or other services dictated by regulation because the regulation will quickly become outdated.

In this instance, adherence to a specific list of professional services that must be provided at specified frequencies has the potential to subject patients to unnecessary tests or services. Instead of having a regulation that specifically prescribes professional services to be provided, the regulation should require that necessary professional services be required as determined by the Department in consultation with long-term care physicians. The regulation should require that the list of necessary professional services be updated on a regular basis.

Regulations like this one, which quickly become outdated, necessarily are ineffective and unduly burdensome. For example, the Department recently sent a blast fax to providers explaining that an annual urinalysis required by §19-13-D8t(n)(8)(B)(ii) is “no longer consistent with current standards of care.” Because the regulation requires the urinalysis, however, providers MUST file for a waiver of the requirement and include detailed information as to why such a waiver is warranted.
Moreover, the Department must spend the time and effort to review the requested waiver, ensure that all appropriate information and respond to the provider. Even once the Department has broader waiver authority, the fact that providers must seek waivers for requirements that no longer comport with standards of care is unduly burdensome on both the provider and the Department.

COMMENT FOURTEEN

Regulation:

19-13-D8t(q)(3)(D) and (F)

Relevant Agency:

Department of Public Health

Action Sought:

Revision – Change (D) from “Serves at least three meals, or their equivalent, daily at regular hours, with not more than a 14 hour span between evening meal and breakfast” to “Serves at least three meals, or their equivalent, daily at regular hours, with not more than a 14 hour span between evening meal and breakfast unless a nourishing snack is provided at bedtime, then up to 16 hours may elapse between a substantial evening meal and breakfast the following day if a resident group agrees to this meal span.”

Revision – Change (F) from “Provides bedtime nourishments for each patient, unless medically contraindicated and documented in the patient’s care plan” to “Offers bedtime nourishments to each patient, unless medically contraindicated and documented in the patient’s care plan.”

Reason:

Nursing homes have been instituting culture change initiatives focusing on resident choice for meal times. Instituting such
Culture change is contrary to strict dining time requirements. Further, the change sought here, to permit 16 hours between meals where a nourishing bedtime snack is offered, is consistent with the federal requirements. The change clearly would not adversely impact residents, as the federal government has approved of the requirement, and would facilitate the culture change by providing more flexibility.

Finally, changing the requirement that snacks are provided to each resident as opposed to offered results in the unnecessary waste of food. Again, federal rules require only that bedtime snacks be offered. This change would not impact residents and would serve to curb unnecessary expenses.

**COMMENT FIFTEEN**

**Regulation:**

19-13-D8t(r)(3) and (s)(5)

**Relevant Agency:**

Department of Public Health

**Action Sought:**

Revise the language to require that staffing hours or ratios for the therapeutic recreation director and social work service staff be determined by census at the facility as opposed to the number of licensed beds.

**Reason:**

Few facilities have a census that parallels licensed capacity. Therefore, requiring staff based on the licensed capacity as opposed to actual census is ineffective and unnecessarily burdensome. Nurse staffing is determined by the facility’s actual census, not the number of licensed beds. See 19-13-D8t(m)(5) and (6). As with nurse staffing requirements,
therapeutic recreation director and social work service staff requirements that are based on census will not endanger the life, safety or health of any patient and should be the regulatory standard.

**COMMENT SIXTEEN**

<table>
<thead>
<tr>
<th>Regulation:</th>
<th>19-13-D8t(s)(8) and (9)</th>
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<tbody>
<tr>
<td>Relevant Agency:</td>
<td>Department of Public Health</td>
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<tr>
<td>Action Sought:</td>
<td>Revision – Remove from social workers the responsibility to conduct annual inservice training on personal and property rights and on an area specific to the needs of the resident population. The facility would remain responsible for performing the training.</td>
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<tr>
<td>Reason:</td>
<td>The inservice training need not be provided by a social worker to be effective and requiring the social work to perform the training unnecessary interferes with the more relevant social work duties. Other facility staff members could perform the inservice training.</td>
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</table>

**COMMENT SEVENTEEN**

<table>
<thead>
<tr>
<th>Regulation:</th>
<th>19-13-D8t(v)(7)(E)</th>
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<tbody>
<tr>
<td>Relevant Agency:</td>
<td>Department of Public Health</td>
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<tr>
<td>Action Sought:</td>
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<tr>
<td>Revision – Require that the equipment be offered but do not require that it be provided if a patient does not want the equipment in his or her room.</td>
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<td>Reason:</td>
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<td>The current regulation requires that the facility provide a list of items in all patient rooms including a mirror, bedside table, armchair etc. As currently written, the facility must provide the equipment listed and cannot remove the equipment if the patient rejects it. Such a requirement is not only ineffective but also impinges on the patient’s ability to choose the equipment he or she wants in the room.</td>
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**COMMENT EIGHTEEN**

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<th>Regulation:</th>
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<tbody>
<tr>
<td>19-13-D8t(v)(8)(C)</td>
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<th>Relevant Agency:</th>
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<tr>
<td>Department of Public Health</td>
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<table>
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<tr>
<th>Action Sought:</th>
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<tbody>
<tr>
<td>Remove the requirement that there be a bathtub on each nursing unit or in the alternative, reduce the requirement from 1 tub per unit to 1 tub per facility.</td>
</tr>
<tr>
<td>Reason:</td>
</tr>
<tr>
<td>Most nursing home residents do not take baths; they prefer showers. Therefore, requiring a tub on each unit is ineffective and unnecessarily burdensome.</td>
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<tr>
<td>COMMENT NINETEEN</td>
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<td>-----------------</td>
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<tr>
<td>19-13-D8t(v)(9)(iv)</td>
</tr>
<tr>
<td>Department of Public Health</td>
</tr>
<tr>
<td>Remove the requirement that each facility have a bedpan washing and flushing device.</td>
</tr>
<tr>
<td>Facilities no longer use metal bedpans that require a bedpan flushing and washing device. As a result of this regulation, maintenance staff must flush the required device monthly because it is unused. Requiring these devices is inefficient and unnecessarily burdensome.</td>
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<tr>
<th>COMMENT TWENTY</th>
<th>Regulation:</th>
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</thead>
<tbody>
<tr>
<td>19-13-D8t(v)(10)(A)(1)</td>
<td>Relevant Agency:</td>
</tr>
<tr>
<td>Department of Public Health</td>
<td>Action Sought:</td>
</tr>
<tr>
<td>Remove the requirement that each facility have an examination room.</td>
<td>Reason:</td>
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</table>
Most physicians examine residents at the resident’s bedside. Therefore, the requirement that there be a dedicated exam room space is excessive and unnecessarily burdensome.

**COMMENT TWENTY-ONE**

Regulation:

19-13-D8t(v)(20)(A)

Relevant Agency:

Department of Public Health

Action Sought:

Change the requirement for stretchers to one per floor.

Reason:

Currently, the regulation requires that the facility have one stretcher per nursing unit. This requirement is excessive and as a result is unnecessarily burdensome.

**COMMENT TWENTY-TWO**

Regulation:

19-13-D8t(v)(20)(I)

Relevant Agency:

Department of Public Health

Action Sought:

Remove the requirement that each facility have one autoclave.

Reason:

Facilities have no need for an autoclave. Such a need may have
existed in the past but it no longer exists. Requiring such costly equipment is unnecessary.
<table>
<thead>
<tr>
<th>CT Assn. of Health Care Facilities</th>
<th>On behalf of member facilities</th>
<th>East Hartford Social Services, Dept Of</th>
<th>Waiting List Regulations</th>
<th>17-311-200 et seq.</th>
<th>General Comment: The provisions in the Waiting List regulations, enacted in 1988 (except for 17-311-209 which was enacted in 1990) and never updated, are antiquated and impose unreasonable administrative burdens on facilities without any added benefits. The most overbearing and unnecessary requirement are addressed below.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Regulation:</td>
<td>17-311-200(b) and (c)</td>
<td>Relevant Agency: Department of Social Services</td>
<td>Action Sought: (1) Remove &quot;or general assistance benefits from a town&quot; from (b).</td>
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<tr>
<td>(2) Revise the definition of “applicant for admission” in (c) as follows: “applicant for admission means any person who either himself or through a representative, including but not limited to his guardian, conservator, family member or physician, indicates a desire to the nursing home to be admitted into such nursing home. A general inquiry from a hospital does not create an applicant for admission under this section. Such indication of desire for admission to the nursing home may be communicated to the facility by a person or his representative in person, by mail, by telephone or by electronic mail to the individual or address specified by the facility for indicating a desire for admission. Nursing homes may not restrict applicant for admission status to those persons who have personally visited the facility, completed and signed application forms, submitted medical, social or financial information, or in any other way not expressly permitted by this section.”</td>
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<td>12/13/2013 3:23:58 PM</td>
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(2) In the 25 years since this regulation took effect, technology has changed dramatically. Hospital discharge planners now use systems such as eDischarge, an automated fax notification system. This system allows discharge planners to seek admission for patients to a large number of nursing homes at one time and has greatly increased the number of "inquiries" which a nursing home receives. Most of these patients never specifically expressed an interest in the facility. Because the regulation is unclear as to whether these general inquiries fall within this regulations, many facilities have been including them and are overcome with the administrative burden complying with the related requirements. In fact, one administrator reported that his facility sent out 1,154 receipts in the first six months of 2013 as a direct result of these general inquiries. This is time consuming and expensive. These names of these persons are then also added to the dated list of applications. Not only is management of these requirements unnecessarily burdensome on facilities, they also no longer serve the intended purpose and are totally ineffective with respect to general inquiries made by hospitals.

Furthermore, the current definition does not acknowledge the use of electronic mail. The revision provides for the use of electronic mail to indicate a desire provided that it is sent to the individual or address designated by the facility for handling indications of desire for admission.

Regulation:

17-311-204

Relevant Agency:

Department of Social Services

Action Sought:
Revise the language to remove the requirement that the dated list of applications be maintained in a bound volume and replace with “Such dated list of applications shall be maintained either in a bound volume or an electronically generated list that ensures the integrity of the data entered. The list must be in the chronological order in which the persons contacted the facility and indicated a desire to be admitted with the date and time of initial contact indicated by the person’s name.”

Reason:

In 1988, when this regulation took effect, adequate electronic means were not readily available to facilities for maintaining a list. Twenty-five years later, requiring a bound volume is outdated, unnecessarily burdensome, and ineffective. As with the advent of electronic medical records, it is possible and, in fact, preferable to maintain such records electronically not only to reduce document storage needs but also to add a level of security. The ability to track changes made to electronic files far surpasses the ability to track hand-written changes to a bound volume.

Regulation:

17-311-205

Relevant Agency:

Department of Social Services

Action Sought:

(1) Revise the language in (a) as follows: Add electronic mail and facsimile as acceptable methods of sending a written application form.

(2) Add the following language to the end of (b): An application that does not include requested financial information shall not be considered substantially complete.
Reason:

(1) The additions of electronic mail and facsimile are required to update this regulation to acknowledge advances in technology.

(2) The addition of this language provides the necessary clarification for facilities that applications without requested financial information do not entitle one to occupy a space on the waiting list. Establishment of a payor source and the ability to meet Medicaid requirements now or in the future are critical components of the application. This is consistent with 17-311-209(b)(1).

Regulation:

17-311-206

Relevant Agency:

Department of Social Services

Action Sought:

Revise the language in (a) to remove the requirement that the waiting list be maintained in a bound volume and replace with "which shall be maintained either in a bound volume or an electronically generated list that ensures the integrity of the data entered. The waiting list must contain the names of persons who have substantially completed and returned to the facility the written application form."

Reason:

In 1988, when this regulation took effect, adequate electronic means were not readily available to facilities for maintaining a list. Twenty-five years later, requiring a bound volume is the epitome of outdated, unnecessarily burdensome, and ineffective. As with the advent of electronic medical records, it is possible and, in fact, preferable to maintain such records electronically not only to reduce document storage needs but
also to add a level of security. The ability to track changes made to electronic files far surpasses the ability to track hand-written changes to a bound volume.

Regulation:

17-311-207

Relevant Agency:

Department of Social Services

Action Sought:

(1) Repeal this section.

(2) In the alternative, revise the language to remove the requirement that the daily log be maintained in a bound volume and replace with “which shall be maintained either in a bound volume or in an electronic record that automatically records the date, time and author and does not permit any data to be overwritten or changed without maintaining a record of the originally entered data. The daily log must be completed...”.

Reason:

(1) P.A. 93-381 removed the daily log requirement from the statute in 1993 and therefore, there is no longer a need for it in the regulation. See §19a-533.

(2) Electronic records are becoming the norm. Requiring the maintenance of bound volumes is consistent with the standard 25 years ago. Medical records are now successfully maintained electronically as well as many other types of records and facilities should be permitted to maintain all of its required documentation electronically. Current technology allows for the integrity of the data to be maintained through automatic date, time and author stamps and by not allowing permanent deletions.
Regulation:
17-311-209

Relevant Agency:
Department of Social Services

Action Sought:
Add: (21) Regardless of the ratio of payer mix, if at the time of vacancy a nursing home has residents who have been Medicaid pending for longer than 90 days or are in a Medicaid penalty period and the facility is receiving no payment for care for those residents, then the nursing home may admit the next self-pay person on the waiting list.

Reason:
Nursing homes are must continue to provide care for patients with Medicaid applications pending and for those with imposed penalty periods without being paid for that care. While the cost of that care may be reimbursed if a pending application is granted without a penalty period, many times a penalty period is imposed or the delay in granting the application is so extensive as to create a financial hardship for the facility. The difference in payment rates between self-pay and those individuals receiving assistance will help to carry the overwhelming burden it has as a result of penalty periods and delayed Medicaid applications.
<table>
<thead>
<tr>
<th>CT Assn. of Health Care Facilities</th>
<th>On behalf of member facilities</th>
<th>East Hartford Social Services, Dept Of</th>
<th>Patient Personal Allowance</th>
<th>17-2-140 et seq.</th>
<th>COMMENT ONE</th>
<th>Regulation:</th>
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<td>17-2-140 through 17-2-145</td>
<td>Relevant Agency:</td>
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<td>Department of Social Services</td>
<td>Action Sought:</td>
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<td>Update all dollar amounts referenced herein to reflect appropriate increases since time regulations were implemented.</td>
<td>Reason:</td>
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<td>These regulations have not been updated with respect to dollar amounts for PPA, allowable gifts, burial accounts etc. since 1978 and are no longer accurate or reasonable given the passage of time.</td>
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<td>COMMENT TWO</td>
<td>Regulation:</td>
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<td>17-2-143(C)(10)(i)</td>
<td>Relevant Agency:</td>
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<td></td>
<td>Department of Social Services</td>
<td>Action Sought:</td>
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<td>Increase the value of a gift that a resident may use his or her personal needs allowance to give or purchase from $25 to an amount not to exceed the value of the monthly personal needs allowance.</td>
<td>Reason:</td>
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<td>12/13/2013 3:28:47 PM</td>
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This regulation took effect in 1978 and has not been amended. According to the regulation, the amount of the personal needs allowance at that time was $25 per month. Clearly, the intention of the regulation was to limit gifts to the amount paid to the resident monthly as a personal needs allowance. The proposed change eliminates the need for future changes due to increases in the personal needs allowance.
<table>
<thead>
<tr>
<th>CT Assn. of Health Care Facilities</th>
<th>On behalf of member facilities</th>
<th>East Hartford Social Services, Dept Of</th>
<th>Reimbursement Regulations - Updates</th>
<th>17-311-1 et seq.</th>
<th>General Comment: the following regulations refer to transferred, repealed or obsolete statutes or use language which has changed.</th>
</tr>
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<td>Regulations:</td>
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<td>§17-311-12 (refers to C.G.S. section 17-311)</td>
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<td>§17-311-38 (refers to C.G.S. section 17-2)</td>
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<td>§§ 17-311-47 and 50 (refer to 17-311 (c)).</td>
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<td>§§17-311-52 and 54 (refer to homes for the aged, now “residential care homes”)</td>
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<td>§17-311-60a refers to (C.G.S. 17-314(b), etc.17-2-143(C)(10)(i))</td>
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<td>§17-311-209 (refers to The Commission on Hospitals and Health Care)</td>
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<td>Relevant Agency:</td>
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<td>Department of Social Services</td>
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<td>Action Sought:</td>
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<td>Update.</td>
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<td>Reason:</td>
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<td>Update to comport with statutory changes.</td>
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<tr>
<td>Name</td>
<td>Town</td>
<td>Office</td>
<td>Issue</td>
<td>Date</td>
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<tr>
<td>James Ferravante</td>
<td>Newtown</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>12/13/2013</td>
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<td>23-4-1(c) and 26-66-2</td>
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<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>Michael Kluczinsky</td>
<td>Oakville</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carrying handguns in state forest</td>
<td>12/14/2013</td>
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<td>23-4-1(c) &amp; 26-66-2</td>
<td>12:02:13 AM</td>
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<td>Please modify the state agencies regulations to allow individuals with valid permits to carry pistols and revolvers to carry a handgun for self defense while in CT state forest and parks specifically: - remove the prohibition on the 'carrying of firearms' insertion 23-4-1(c) of the Connecticut agencies regulations - Add exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purpose of self defense.</td>
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</tr>
<tr>
<td>Gloria Sadlowski</td>
<td>Rockfall-Middlefield Public Health, Dept Of</td>
<td>hospital medical records</td>
<td>Section 19-13-D 3(d) (6)</td>
<td>This regulation could perhaps be modified so essential medical records are kept. For my situation this regulation has been unnecessarily burdensome. This is briefly described. My insurance hospital records for physical injuries from years ago do not exist because of this regulation. I wanted to have a full-time job starting in 2003 and work for about ten years for retirement savings. Instead I was not hired for the jobs I applied for. An employer since 2003 required the records (they are also required for Department of Labor employment assistance and unemployment benefits). I did contact the Department of Social Services in 2003. I could not afford to replace the records myself. I did not know all my medical problems. I spent several years trying to learn a skill I eventually realized I could not do. I could not pay the town taxes, then a foreclosure started late 2008 and my house was sold. I continued the cases pro se with little money available and am still in the courts trying to get my house back. I had to apply for Social Security which did not seem right for my missing old insurance medical records problem. Supplemental Security Income was approved after more than 3 1/2 years. I thought I would start to recover and be able to finally start to pay the taxes and do home repairs, but soon an eviction happened instead. I wish there was a better way to rebuild missing records and described with my court papers the possibility of a program for this. With the Disability Act better methods should perhaps also be used. This regulation took the medical records I need and then employment assistance, jobs, savings, earnings, access to my house and possessions, and maybe my house; and also contributed to many horrible problems.</td>
<td>12/14/2013 10:01:55 AM</td>
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<tr>
<td>Name</td>
<td>Town</td>
<td>Department</td>
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</table>
| John Streiber         | Ellington    | Energy and Environmental Protection, Dept Of    | carrying handguns in state forests                                  | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. |
| John Harding          | Cornwall bridge | Treasurer, Office Of The State | Taxes and budget                                                     | Do not increase taxes. Stop entitlement programs and spending. The state of ct and it's tax structure is the highest in all the states.  
You are ruining our state by overspending and bankrupting us.  
Stop spending money we do not have and do not raise taxes.  
John and Catharine Harding  
Cornwall bridge, CT     |
<table>
<thead>
<tr>
<th>Name</th>
<th>Location</th>
<th>Department</th>
<th>Topic</th>
<th>Regulation Numbers</th>
<th>Message</th>
<th>Date and Time</th>
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<tbody>
<tr>
<td>David Zita</td>
<td>Old Lyme</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>fishing tournaments</td>
<td>26-159a-26</td>
<td>Please repeal this regulation in its entirety. It serves no useful purpose in the real world. Here’s what it does. If I get together with several friends and decide have a friendly competition with prizes to the victors, we become outlaws for not following these rules. There is no conservation purpose served whatsoever. I follow all regulations concerning seasons, sizes, and bag limits without complaint because doing so serves the goal of conservation and wise use of resources. This regulation, however well intended, does not and is just plain nuts. Please understand that I worked for DMHAS for 25 years and I have a sophisticated appreciation for the importance of regulations. This regulation is nothing but a nuisance. I guess I just want DEEP off my boat. Please repeal 26-159a-26. Thanks for hearing my gripe.</td>
<td>12/15/2013 10:02:04 AM</td>
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<tr>
<td>Evangelo Sfakios</td>
<td>North Windham</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>carry handguns in State Forests/par</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Robert Rainville</td>
<td>Griswold, CT</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>Carrying handguns in State Forests</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<td>Assigned departments, departments, etc.</td>
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<td>Thomas R Burkholder</td>
<td>Bristol</td>
<td>Administrative Services, Dept Of</td>
<td>Multi-year contract prohibition</td>
<td>12/15/2013</td>
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<td>In the past several years, we have been told by the “auditors” that we could not enter into a multi-year contract for maintenance or services for instrumentation, equipment, etc. even though most vendors offer significant discounts for multi-year contracts. These contracts have been renewed annually for years and non-renewal would lead to failure of these instruments and equipment. If this is a regulation, it’s not clear how you would even begin to find it in the database.</td>
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<td>Mary Uriano</td>
<td>Manchester</td>
<td>I don’t know</td>
<td>family caregiver compensation</td>
<td>12/15/2013</td>
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<td>The fact that CT does not compensate family caregivers is very burdensome to the person that requires care &amp; their family. The referrals to outside care is more frustrating than helpful, to all involved. The person requiring care should have a choice. Thank You</td>
<td>12/15/2013 12:56:56 PM</td>
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<tr>
<td>mark moorman</td>
<td>Judicial Review Council</td>
<td>DOL- AGENT for Federal TRA</td>
<td>Please forward my request to have issues with the DOL-TRA unemployment/ TRA/TRA reviewed and a forum to discuss the broad impact of the duties of the State as the * Agent of the Federal Government for the state of ct TRA program. Please respond via e-mail when and where these topic can bee discussed! Mark Moorman 203-263-3198</td>
<td>12/15/2013 5:05:49 PM</td>
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Martha F. Neal

I am writing to urge you to review the regulations pertaining to Prevailing Wage.

The ceiling of $100,000.00 for maintenance contracts has been in effect since 1991. The cost of materials has risen significantly since 1991 and municipalities and taxpayers are paying one-third more than necessary because of the Prevailing Wage ceiling. I would urge you to raise this ceiling to $500,000.00. At a time when taxpayers and municipalities are struggling to resurface roads, paint town buildings and take care of significant assets, it seems unfair that they should have to pay so much more because of outdated regulations.

Additionally the ceiling for new building should be raised to $5,000,000.00. Once again the current ceiling has not been raised since 1991. It is unrealistic to expect municipalities to work with a regulation which does not allow new construction without the burden of additional and unnecessary costs.

Small towns without huge commercial income suffer hugely from the current prevailing wage regulation. These towns could receive much more in the way of services if the ceilings were raised to realistic levels. In addition, the current regulations put additional financial burdens on small businesses that deal with municipal contracts.

The current Prevailing Wage Regulation is outdated and unrealistic, it needs to be addressed.

Martha F. Neal
| JOHN GOULD | NORWICH | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | 23-4-1(c) and 26-66-2 | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/15/2013 8:00:58 PM |

| | | government regulations | | | Dear Sirs:

Attached are my comments regarding burdensome government regulations/statutes. I thank you for the opportunity to express my views and concerns. I have also included a prominent attorney’s remarks regarding a recent US Supreme Court case that concerns the issues that I raise.

Sincerely,

Charles Rinaldi
Enfield | 12/12/2013 12:14:57 PM |
Dear Sir/Madame,

In response to Governor Daniel Malloy’s October 16, 2013, Executive Order No. 37 that invites public comment on ineffective regulations over four years old, we submit (ATTACHED) our suggestions with respect to such regulations pertaining to alcohol beverages under the jurisdiction of the Department of Consumer Protection ("Department").

Respectfully,

Dwayne A. Kratt
Sr. Director, Government Relations, NE Diageo
801 Main Avenue
Norwalk, CT 06851
O - 203-229-4504
M - 203-286-9044
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http://www.diageo.com

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_000_1BED6AAE811AF343BA756586A28497DA02489C63A5DCA VM5G005Agu_<
In accordance with Executive Order No. 37, please find attached our Request to Amend the Regulations of the Connecticut Department of Motor Vehicles. Please contact me if you should have any questions.

Thank you for your anticipated assistance.

Sincerely,

John A. Acampora, Esq.
Cohen and Acampora
8 Frontage Road
East Haven, CT 06512
O: 203-467-7337
F: 203-468-7865

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 Comments re Section 19-13-D5 of CT State Regulations
Delivery Status

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12/13/2013 6:21:15 PM
I am an APRN and business owner of a small medical practice. The state of CT has restricted the scope of practice of nurse practitioners by mandating a collaborative agreement with a physician. This collaborative agreement restricts our ability to practice to our full potential and restricts access to quality of care for many CT residents.

This very outdated law needs to change, especially now with the physician shortage and the changes in all residents obtaining health insurance. Currently, there are not enough primary care providers to care for the huge influx of newly insured residents. I have been looking to add nurse practitioners to my business to enhance access to care and so far they have not been able to join me because they have not been able to secure a collaborative agreement from a physician.

This problem is huge! I could give you much more information but would prefer discussing this with you further via phone conversation or in person. Should you require more information please do not hesitate to contact me at 860-729-4514.

Thank you,
Shery Marinone, APRN

Sent from my iPad
Dear Governor Malloy

I am writing to comment on the updating of state regulations Section 15-140f-1 and Section 15-140j-2. If these regulations were to change to allow online education, for knowledge based information that is incorporated in the basic boating safety course that leads to certification, it would have a very positive outcome. Having the ability to take online courses opens up the ability for many more residents to advantage of that type of learning experience as it will be used for new boaters but also refreshers for those of us who have been boating for years. On line classes afford State residents to take the class when it is best for them.

The move to online education will free current D.E.E.P. staff allowing them to expand their on water skills concept to more boaters. The on water boating education, which is being promoted by the USCG, will help to create a safer boating experience on Connecticut waters.

Small changes can make big difference, from saving funds to saving lives; these changes warrant your consideration.

Sincerely,

Dean Rustic
<table>
<thead>
<tr>
<th>Online Boating education</th>
<th>[Comment Emailed with an attachment: &quot;Dear Governor Malloy.doc&quot;]</th>
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<td>The information transmitted is intended only for the person or</td>
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Ronald J. Frisk
Director Of Telecommunications
225 North Main Street
Bristol, CT 06010
Phone/Fax: 860.584.4411
Mobile: 860.940.5553
Response to the Governor's Executive Order No. 37 - CHA

[Comment Emailed with an attachment: "Regulation Review 2013 to Malloy.pdf"]

The Connecticut Hospital Association (CHA) respectfully submits the following letter for consideration in response to the Governor’s Executive Order No. 37.

If you have any questions, please contact me.

Thank you,

James Iacobellis

James Iacobellis  
Senior Vice President, Government and Regulatory Affairs  
Connecticut Hospital Association  
(203) 294-7310  
Iacobellis@chime.org

--

_000_0D1750754D46DF4D89B756203ADCEE783956EEExchange 1cthosplo_<
Dear Governor Malloy

I am writing to comment on the updating of state regulations Section 15-140f-1 and Section 15-140j-2. If these regulations were to change to allow online education for knowledge based information that is incorporated in the basic boating safety course that leads to certification. Having the ability to take online courses opens up the ability for many more residents to advantage of that type of learning experience as it will be used for new boaters and also refreshers for those of us who have been boating for years. On line classes afford State residents to take the class when it is best for them.

The move to online education will free current D.E.E.P. staff allowing them to expand their on water skills concept to more boaters. The on water boating education, which is being promoted by the USCG, will help to create a safer boating experience on Connecticut waters.

Small changes can make big difference, from saving funds to saving lives; these changes warrant your consideration.

Sincerely,

Dean Rustic
Conservation Director
CT B.A.S.S. Nation
209 Deer Run
Burlington, CT 06013
(860) 916-1957
--001a11c1e98086ecfd04ed9bcb4b<
Public funding for daycare and education for teachers

Governor Malloy,

While I appreciate what the state is trying to do regarding early childhood education I'm disappointed that there are not programs in place to pay for the education of the workers. Because of our combined income my wife does not qualify for grants. We cannot afford to send her to school and she will lose her job once everything is in effect.

You’re answer to it is that it only applies to those seeking state funded children. Unfortunately that means almost all day care facilities. I would like to see some funding be made available to current workers that will be unemployed once the law takes full effect with reasonable income requirements.

</
Thank you for the opportunity to comment. See attached.

--
Eloise Hazelwood, RS, MPH
Director of Health
Town of Wallingford
203-294-2065
wlfdhealth@sbcglobal.net

Online Boating Course

Please see the attached letter on this topic. Thank you for taking this into consideration.

-----=_Part_115121_1152422083.1387171066211<
Dear Governor Malloy,

Since Senator Chapin sent a mailer recently with a paragraph about eliminating regulations that are unnecessary, burdensome and ineffective, and is more than 4 years old, I can think of one that fits most of the qualifications but may be a federal regulation. Why not eliminate it in our state at least. It is the one that requires everyone boarding an airplane to remove his or her shoes because a terrorist once had an explosive in his and was discovered before it did any damage. Terrorists do not use any old plans that were unsuccessful! And pat downs should go, too! Thank you. Merry Christmas and Happy New Year! Audrey Battista

------=_NextPart_000_001C_01CEF7EE.46605AC0<
Please see attached and below... Hospital for Special Care is requesting this minor change in DPH regulations as a part of the Governor’s review process. We believe this was a technical oversight that was simply missed when DPH changed the record retention period for acute care hospitals. The additional 15 year retention period that only applies to chronic disease hospitals is both costly and burdensome. Please feel free to contact us with any questions.

Jason Jakubowski
Vice President for Government Relations
Hospital for Special Care
2150 Corbin Avenue
New Britain, CT 06053
(860) 827-4858
www.hfsc.org

From: Deborah Lobb
To: Jason Jakubowski
Cc: Laurie Whelan; Deborah Lobb
Subject: Record Retention & Record Completion Alignment

I believe that when the state medical record retention was changed from 25 years to 10 years, section 19-13-D5, Chronic Disease Hospital was not included in this change. I believe this was just a general oversight and should be brought into alignment.

I am respectfully requesting changing of legislative wording so that Sec. 19-13-D5 coincides with record retention and completion requirements with Sec. 19-13-D3 (acute care).

1. Change from 25 years retention to 10 years retention
2. Change from 14 days to 30 days completion (consistent
Long-term Hospital: Chronic Disease Hospital: Sec 19-13-D5; page 38  (d) Medical Records  (4) Medical records shall be filed in an accessible manner in the hospital and shall be kept for a minimum of twenty-five years after discharge of patients, except that the original medical records may be destroyed sooner if they are microfilmed by a process approved by the state department of health. (5) Medical records shall be completed within fourteen days after discharge of the patient except in unusual circumstances which shall be specified in the medical staff rules and regulations. Persistent failure by a physician to maintain proper records of his patients, promptly prepared and completed, shall constitute grounds for suspending or withdrawing his medical staff privileges.

Acute Care wording: Sec. 19-13-D 3; page 10   (d) Medical Records  (6) Medical records shall be filed in an accessible manner and shall be kept for a minimum of ten years after discharge of patients, except that the original medical records may be destroyed sooner if they are preserved by a process consistent with current hospital industry standards. The hospital shall provide the Department of Public Health with a list of the process or processes it uses. (7). Medical records shall be completed within thirty days after discharge of the patient except in unusual circumstances which shall be specified in the medical staff rules and regulations. One of these specified circumstances shall be that the hospital discharge summary shall be completed and shall accompany patients at the time of discharge to another health care facility. Persistent failure by a physician to maintain proper records of his patients, promptly prepared and completed, shall constitute grounds for disciplinary action with respect to medical staff privileges.

Chronic & Convalescent Nursing Homes and rest homes with nursing supervision; Sec 19-13-D8t; page 78  (o) Medical Records  (5) All medical records, originals or copies, shall be preserved for at least ten (10) years following death or discharge of the patient.
Thank you for this opportunity.

Most of my experience with state agencies is with the Department of Public Health, primarily HIV/AIDS and Chronic Disease and Tobacco Cessation programs.

Regulations/contract language being interpreted differently between departments

Definitions of budget expenditures are different between departments

How budgets are calculated - for example, while the cost standards allow for direct, allocable as direct, and indirect (administrative and general expenses), I have never had any state employee allow for allocable as direct. It is either direct or indirect. In 2007-2008 I spent many days of my time learning the cost standards and budgeting accordingly only to be told that the department didn't do it that way.

Inconsistent definition of the limitation of A and G expenses in a budget: sometimes it is 15% of the total direct expenses, sometimes it is 15% of the total grant. A grant RFP has one definition but the department uses another.

Audits of expenditure reports occurring months, and often times years after expenditures have been made. This does not allow for any opportunity to take any corrective action. One such audit resulted in our agency expending an entire grant of $94,000, only to be told that we needed to return $17,000, or almost 20% of the total grant. This is a significant loss.

Required to complete many types of financial reports, with redundancy: report salary and fringe benefits by each employee rather than having the salary and fringe line item
summaries being enough.

Again, thank you for this opportunity. Please feel free to be in touch with any questions.

Linda Estabrook, MPH
Executive Director
Hartford Gay & Lesbian Health Collective
P.O. Box 2094
Hartford, CT 06145-2094
Phone: 860-278-4163 Ext. 14
Fax: 860-278-5995
Email: lindae@hglhc.org
Web: http://www.hglhc.org

Follow HGLHC on Facebook and Twitter!

"Proudly Serving the LGBT Community Since 1983"

Our Mission - The Hartford Gay and Lesbian Health Collective empowers individuals of diverse sexual orientations, gender identities and gender expressions to lead healthy lives through the provision of health and support services, education and advocacy.

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affiliates (HGLHC). E-mail transmission cannot be guaranteed to be error-free or secure from viruses, and HGLHC disclaims all liability for any resulting damage, errors, or omissions.

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Dear Governor Malloy -

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Thank You!

Kevin J. Noel
Mohawk Valley Basscaster Club Member
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| John J. Mathieu    | Norwich | Energy and Environmental Protection, Dept Of | Carrying handguns in State Forests | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
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- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/16/2013   |
| Vincent Anton      | Bristol | Energy and Environmental Protection, Dept Of | Handguns in state forests/parks   | Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:  
- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations  
- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense. | 12/16/2013   |
Under the governing Principles applicable to the League of Women Voters across the U.S., the League of Women Voters of Connecticut believes that democratic government depends upon informed and active participation in government, and that responsible government should share in the solution of economic and social problems that affect the general welfare and promote the conservation and development of natural resources in the public interest.

In issuing Executive Order No. 37, the Governor includes among its stated goals to “identify those [regulations] that have become outdated, unnecessarily burdensome, insufficient, or ineffective.” In the preamble, E.O. 37 states that “the procedures required under Connecticut law for promulgating and amending regulations can be time-consuming and cumbersome and, as a result, regulations that should be repealed or modified are left unchanged.”

E.O. 37 apparently is applicable to all Regulations of State Agencies included within the State Administrative Code, ranging from Title 19 Public Health and Safety, Title 17a Social and Human Services, Title 21 Consumer Protection, to Title 28 Civil Preparedness and Emergency Services, and Title 22a Environmental Protection.

As our state continues to struggle with high unemployment and low job growth, we understand the need to examine our state’s practices. Despite the seemingly all-inclusive scope of the directive announced by the Governor, E.O. 37 fails to acknowledge any benefits of regulatory action beyond economic and job development. Absent is any recognition of public health and safety, improvement of the general welfare or protection of our natural resources as a goal of government. Agencies are directed to “endeavor to encourage economic progress and the development of jobs in Connecticut, and only seek to regulate when there is a clear need for regulation.” Clearly, cost-benefit analysis should include public and societal costs, not solely immediate costs of regulated entities.

Executive Order 37 adds more complexity to the review process, notwithstanding its stated goal of streamlining the process. The directive establishes a broad category of “regulation of significant impact” and mandates that “any regulatory action relating [to] a regulation of significant impact” requires “rigorous
impact analysis,” a review of costs and benefits “based on the best available empirical and scientific information,” and engagement with “external experts and academic institutions to inform such impact analysis.”

What category of regulation requires this expensive and time-consuming agency process? “[A]ny regulation that may have an adverse impact on small businesses,” as well as one with “a significant financial impact on medium or large businesses,” or “anticipated” significant cost to the state or to any municipality is included. Finally, a regulation may be deemed to be of significant impact if, solely “in the judgment of the Governor’s Office, the Office of Policy & Management, or the agency, based [only] on public comment received, the potential regulation presents a substantial shift in policy or is anticipated to place substantial burdens on citizens or the private sector.”

Connecticut provides an array of economic, advisory, and technical assistance to the business community. Connecticut also serves to protect the well-being of its citizens. The balancing of these needs is the basis for responsible growth. The League of Women Voters of Connecticut believes that an informed, transparent and accountable process for promulgating and amending state regulations can benefit the citizens, businesses and municipalities of Connecticut, when that process recognizes the need to balance business interests with protecting public health and safety, preserving our natural heritage, and meeting the needs of our most vulnerable members of society.
Review of the Community Service Policy Manual for services provided under Title III of the Older Americans Act of 1965 reveals that the regulations are out of date and do not reflect significant changes to the Older Americans Act implemented by the reauthorizations in 2000 and 2006. The following includes portions of the Older Americans Act which are not reflected in the State regulations. This is by no means a full listing and the recommendation is to do a complete review and rewrite of the policy manual to alignment the document with the Older Americans Act of 1965, as amended (OAA).

1. Add the new target population groups identified in the OAA such as "individuals residing in rural areas", "older individuals with limited English proficiency" and "older individuals at risk of institutional placement".

2. Remove Title III F Disease Prevention and Health Promotion Services and replace it with Title III D Evidence-based Health Promotion programs.

3. Remove references to Title III D - In Home Services to reflect changes made to the OAA.

4. Remove references to USDA Commodities and Cash and replace with regulations and information regarding the Nutrition Services Incentive Program (NSIP).

5. Add a provision which includes the development of Aging and Disability Resource Centers as defined in the OAA.

6. Revise the percentages of transfer allowances between supportive services program funding and nutrition services program funding to reflect the OAA allowable transfers.

7. Remove references to the Selection of Nutrition Providers and the Bid Procedures for Contacts with Caterers and replace with the current practice which was developed by the Area Agencies on Aging in conjunction with the State Department on Aging.
8. Update the Operating Requirements for Nutrition Service Providers to reflect the requirement identified under the OAA.

9. Remove references to the Administration on Aging and replace with the current name of the governing body “Administration for Community Living” (ACL).

This list is not an all inclusive list of changes required to align the Community Services Policy Manual for Title III of the Older Americans Act with the Older Americans Act of 1965, as amended. A complete review and revision is recommended.

Thank you for the opportunity to provide input into this important endeavor.

Joan Wessell,
Executive Director
Senior Resources - Area Agency on Aging

on behalf of the Connecticut Association of Area Agencies on Aging
A review of the Manual of Fiscal Policies for Title III Programs of the Older Americans Act needs a complete review and revision to bring it up to date with current OMB Circulars governing Federal funding.

The review should include provisions allowed in the following OMB documents:

- OMB Circular A-110 Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals and Other Non-Profit Organizations now referred to as 2CFR Part 215
- OMB Circular A-122 Cost Principles for Non-Profit Organizations now referred to as 2 CFR Part 230
- OMB Circular A-133 and all Compliance Supplements through 2013

This list is not all-inclusive and it is recommended that the Fiscal Policies be reviewed and revised to reflect current government regulations regarding Federal funds.

Thank you for the opportunity to provide input into this important task.

Joan Wessell,
Executive Director
Senior Resources - Area Agency on Aging

on behalf of the Connecticut Association of Area Agencies on Aging
CGS 19a-630 defines an infirmary as caring "for the students, faculty and staff of such institution and their dependents." The regulations of the Department of Public Health use the same wording, but they fail to include the key phrase "and their dependents."

This omission is a burden for Yale Health, the staff-model HMO that serves as the principal source of care for Yale students, over 70 percent of Yale employees, and their dependents. Yale Health operates a 17-bed infirmary. Because DPH regulations do not recognize infirmary beds that are available for dependents, Yale Health maintains two licenses for its 17-bed infirmary: an infirmary license for 13 beds, and a separate Chronic and Convalescent Nursing Home license for the four beds available to dependents. Maintaining separate licenses imposes a significant cost and burden on Yale Health.

It would make more sense for Yale Health to maintain just one Infirmary license that is available to "all member patients." We recommend that DPH conform its regulations to the underlying statute.
Connecticut’s regulations regarding controlled substances duplicate and largely overlap existing federal regulations administered by the US Drug Enforcement Administration. This creates a regulatory burden, more than doubles the licensing costs to individual practitioners, and establishes confusion among the regulated community as to which rules (federal or state) apply. These burdens are especially high on scientific researchers, who are defined under Connecticut’s statutes as controlled substances “Practitioners,” a classification otherwise reserved for those directly involved in prescribing or administering controlled substances for medical or veterinary purposes.

Connecticut’s controlled substances regulations are largely written for the supply chain of these materials and front line medical and veterinary professionals responsible for their prescribing and administering in humans and animals. We suggest that all references to scientific research and research laboratories be removed from the regulations, beginning with the Definitions in 21a-240 (27). We further recommend that scientific researchers and investigators who are not working with human subjects or patients be removed from the category of Practitioner (21a-316).
RCSA 22a-430-3 General Conditions Applicable to Water Discharge Permits

The Department of Energy and Environmental Protection has set multiple standards for wastewater discharge. It is not clear which reporting standard applies under certain circumstances; it would be helpful to regulated entities for DEEP to clarify the regulations.

Section 22a-430-3(j)(11)(E) of DEEP regulations establishes reporting requirements if the results of wastewater discharge testing are above certain levels; this provision is commonly referenced in individual permits as well as many General Permits.

(E) The permittee shall notify the director within seventy-two hours and in writing within thirty days when he or she knows or has reason to believe that the concentration in the discharge of any listed substance or any toxic substance as listed in appendix B or D of this section has exceeded or will exceed the highest of the following levels:

(i) One hundred micrograms per liter;
(ii) Two hundred micrograms per liter for acrolein and acrylonitrile; five hundred micrograms per liter for 2,4-dinitrophenol and for 2-methyl-4, 6-dinitrophenol; and one milligram per liter for antimony;
(iii) An alternative level specified by the commissioner, provided such level shall not exceed the level which can be achieved by the permittee’s treatment system.
(iv) A level two times the level specified in the permit application;

However, the General Permit for the Discharge of Groundwater Remediation Wastewater to a Sanitary Sewer and the General Permit for Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater set much higher threshold for reporting to DEEP.

• Subsection (E)(i) of DEEP regulations requires reporting of concentration of any listed or toxic substance as listed in Appendix B or D that exceeds 100 micrograms per liter.
However, both the General Permit for the Discharge of Groundwater Remediation Wastewater to a Sanitary Sewer and the General Permit for Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater set limit on total volatile organics limit of 5,000 micrograms per liter. If any individual organic compound that is listed in Appendix B or D exceeds 100 micrograms per liter, is reporting required under this section?

- Subsection (E)(ii) of DEEP regulations requires reporting of a concentration of acrolein and acrylonitrile (both volatile organic compounds) that exceeds 200 micrograms per liter. Again, if these substances exceed 200 micrograms per liter, is reporting required or does the General Permit’s 5,000 microgram limit apply?

- Section (E)(ii) of DEEP regulations also requires reporting of 2,4-dinitrophenol and for 2-methyl-4, 6-dinitrophenol above 500 micrograms per liter. The General Permit for the Discharge of Groundwater Remediation Wastewater to a Sanitary Sewer and the General Permit for Miscellaneous Discharges of Sewer Compatible (MISC) Wastewater gives limits for total phenols as 1,000 micrograms per liter, and 10,000 micrograms per liter, respectively. If 2,4-dinitrophenol and for 2-methyl-4, 6-dinitrophenol levels exceed 500 micrograms/L, is reporting required under this section?

- Section (E)(iii) of DEEP regulations allows the Commissioner to set an alternate level different from the discharge limit specified in an individual or General Permit. What are those alternate levels?

- In Section (E)(iv) of DEEP regulations, is the “level two times the levels specified in the permit application” based upon discharge testing conducted as a part of wastewater discharge permit applications? If so, this number still may be well below discharge permit limits.

The difference creates confusion for regulated entities; we suggest that DEEP reexamine the reporting levels and clarify the requirements, perhaps by deleting certain sections.
<table>
<thead>
<tr>
<th>Richard Jacob</th>
<th>Yale University</th>
<th>Energy and Environmental Protection, Dept Of</th>
<th>Nitrogen Oxide Emissions</th>
<th>5. Control of nitrogen oxides emissions</th>
</tr>
</thead>
<tbody>
<tr>
<td>We have comments on multiple sections of the DEEP air quality regulations concerning nitrogen oxide emissions: applicability; emissions testing and monitoring; and reporting and recordkeeping.</td>
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<td><strong>Applicability</strong></td>
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<td>DEEP regulations require that operators must check ambient ozone levels before turning on emergency generators at any time from May through September. The ozone-check must be performed regardless of whether the generator is being turned on to generate power or merely to test its reliability, as required by Medicaid.</td>
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<td>When this regulation was adopted it was targeted toward large generators above a certain generating capacity (a Major Source under the rule’s terminology), but over the years to DEEP has incrementally expanded the application of this rule beyond Major Sources that were the original target of the regulations. DEEP currently interprets the rule to apply to many relatively small sized commercial/institutional emergency generators, thereby extending the rule to thousands of sources including schools, nursing homes, supermarkets, apartment buildings, etc. Operators of many of these generators are probably unaware of the DEEP rule.</td>
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<td>The federal Environmental Protection Agency has recognized through its “Tailoring Rule” that it is ineffective to apply a rule to so many sources that a large proportion of them will be out of compliance due to ignorance or lack of outreach. In Connecticut, most of the smaller sources now covered by the ozone check rule are unaware of this interpretation and most likely do not have any resources to manage compliance with this regulation. We recommend that DEEP take a similar approach and restore the application of ozone check to Major Sources of emissions.</td>
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Emissions testing and monitoring

We recommend three changes to the rules about testing of equipment that generates NOx emissions (22a-174-22(k) of DEEP regulations).

First, testing is currently required every 5 years on the anniversary of the previous test. Many sources are tested several months before the deadline in order to avoid being late; as a result the deadline creeps earlier in the year with each testing cycle. It is ideal to test the equipment in the winter because there is demand for the heat generated by operating the source at full output. However, some sources that were originally tested in the winter are now being tested at the end of fall when the heating demand is less. When tests are scheduled for the warmer months it is difficult to perform the tests because there is not enough demand for the heat generated when the equipment is operating at maximum capacity.

We recommend the following change to the regulation:

Section 22a-174-22(k) (1) The owner or operator of a stationary source subject to an emission limitation under this section shall conduct an emission test to demonstrate compliance with this section no later than one year after becoming subject to this section. Each such emission test shall be conducted in accordance with section 22a-174-5 of the Regulations of Connecticut State Agencies. Compliance with the emission limitations of this section shall be determined based on the average of three (3) one-hour tests, each performed over a consecutive 60-minute period. Any analysis of nitrogen content conducted as part of such emission testing shall be in accordance with Method D-3228 of the American Society for the Testing of Materials. If the commissioner determines that three (3) one-hour tests are not reasonable given the location, configuration or operating conditions of a stationary source, the commissioner may approve testing where compliance with the emission limitations of this section shall be determined based on the average of four (4) fifteen-minute tests, each performed over a consecutive
fifteen-minute period. Any owner or operator of a stationary source who has not installed and operated a continuous emissions monitor at such source shall conduct emission testing once every sixty-two months five years from the date of the previous test or sixty-two months five years from the date the previous test was due, whichever is earlier.

Second, the testing section does not provide any alternative for sources that technically cannot test in accordance with the rule.

We recommend the following addition to the regulation:

(2) The owner or operator shall demonstrate compliance with emission limitations of this section using sampling and analytical procedures approved under 40 CFR 60, Appendix A, or under procedures in section 22a-174-5(d) of the Regulations of Connecticut State Agencies. If such testing is deemed technically infeasible by the Commissioner the owner or operator shall propose alternative compliance methods subject to approval by the Commissioner.

Third, the regulation defines maximum capacity in terms of fuel burned, but it is equally valid to measure maximum capacity by the amount of electricity or steam generated. In fact, measuring capacity in this way gives owners an incentive to find ways to operate generators more efficiently, and thus get credit for achieving lower emissions. The federal Environmental Protection Agency allows flexibility in defining maximum capacity. Connecticut should also allow alternative methods of demonstrating maximum rated capacity such as megawatt output or steam output or some other measurable method. We recommend the following addition to the regulation:

(A) If the commissioner determines that operating at or above ninety percent (90%) of maximum capacity for a fuel burning source or a process source during sampling is not reasonable given the location, configuration or operating conditions of a source, the commissioner may approve testing of a fuel burning source or process source at an alternative maximum capacity where compliance with the emission limitations of this section
shall be determined based on operating at or above ninety percent (90%) of the alternative maximum capacity including output based methods such as kilowatts or pounds of steam produced approved by the commissioner; and

Reporting and record keeping

Section 22a-174-22(l)(c) requires non-GPLPE sources to maintain records for a emissions limits that do not apply to them. The 25- and 50-ton limits apply only to sources subject to subsections (b)(2) and (b)(3); this subsection should be amended to include the qualifying clause, “For any premises for which subsections (b)(2) or (b)(3) of this section applies”.

1) Reporting and record keeping.
   (1) The owner or operator of any source subject to this section, shall keep the following records:
   (A) For an emergency engine, daily records of operating hours of such engine, identifying the operating hours of emergency and non-emergency use;
   (B) For any premises for which subsections (b)(2) or (b)(3) of this section applies, records (e.g. fuel use, continuous emissions monitoring, operating hours) to determine whether the NOx emissions from such premises on any day from May 1 through September 30, inclusive, are in excess of one hundred thirty-seven (137) pounds for premises located in a severe nonattainment area for ozone or two hundred seventy-four (274) pounds for premises located in a serious nonattainment area for ozone.
   (C) For any premises for which subsections (b)(2) or (b)(3) of this section applies, Monthly and annual records (e.g. fuel use, continuous emissions monitoring, operating hours) to determine whether NOx emissions from such premises in any calendar year are in excess of twenty-five (25) tons for premises located in a severe nonattainment area for ozone or fifty (50) tons for premises located in a serious nonattainment area for ozone;
| Richard Jacob | Yale University | Energy and Environmental Protection, Dept Of Radiation Regulation | 19-24 | The DEEP regulations concerning radioactive materials were written at a time when DEEP was responsible for oversight of X-ray equipment and non-Nuclear Regulatory Commission (NRC) regulated radioactive materials like those from accelerators. However, in 2005 the NRC changed their definition of Byproduct material and assumed a phased in responsibility for oversight of radioactive material produced in accelerators. Connecticut is not an NRC Agreement State and DEEP does not issue licenses for work with radioactive material. DEEP retains oversight of x-ray equipment, and its regulations should focus on activities and equipment it does regulate.

The CT DEEP regulations specific to radioactive materials in section 19-24-1 through 14 are duplicative and often conflict with NRC regulations. For example, section 19-24-5 of DEEP regulations list exposure limits that are not consistent with exposure limits set by the NRC. In addition, section 19-24-11 of DEEP regulations details requirements for Reports of Incidents or Loss of Radioactive Material. Again these requirements for reporting are different than the NRC reporting requirements. There is no need to require entities regulated by the NRC to comply with a duplicative body of State regulations. Accordingly, DEEP should amend sections 19-24-1 through 14 to eliminate those provisions that are specific to radioactive material and not x-ray generating equipment.

It would also be helpful for DEEP to reexamine the regulations because they are outdated and confusing.

| 12/16/2013 2:45:33 PM |
DEEP regulations define standards for the disposal of medical waste. Under the regulations, it is industry practice to sterilize medical waste in an autoclave, which is sufficient to render it safe for disposal in an incineration plant. However, DEEP regulations require the additional step of shredding waste; this step is prudent for needles and other “sharps” but is unnecessary for other forms of medical waste that do not present a hazard of cuts or punctures.

We recommend that Section 22a-209-15(f) (7) of DEEP regulations be amended to read,

“Unless it is physically altered so as to render it unrecognizable as biomedical waste, or if it is being sent directly to a trash to energy incineration plant, decontaminated biomedical waste shall be subject to the requirements of this section.”

Clarifying this requirement to make clear that only truly defined “sharps” waste must be rendered unrecognizable would be a relief for those treating and shredding of waste on-site.
Current provisions of § 19-13-B1, specifically sections B, E, F, and H should be removed as the specific public health nuisances listed are antiquated and not relevant in today's society. This modification would modernize current Connecticut public health law as it related to public health nuisances.

Revision would reflect more contemporary understanding of public health nuisances. The following potential changes would be an option to removing the section referenced:

B. Change the wording to make it more general – "Spoiled or adulterated food products"
F. Change the wording to "Transportation of solid waste, garbage, sewage or any other waste product except in leak proof, covered, sanitary containers and/or vehicles."
H. Change the wording to "The by-product of any trade or activity shown to affect public health or produce serious offense."
The absurd idea behind forcing health care providers to obtain a Certificate of Need was to prevent health care providers from overcharging consumers in an attempt to cover their own costs of expansion by restricting the supply of health care providers available to consumers. This has to be the only example of a good or service in the entire world where costs were expected to decline as a result of restricted supply. And, in fact, costs have not declined, either in Connecticut or nationally (a similar regulation is applicable in every state.) A brief look at the Department of Public Health web site shows that about half of Certificate of Need applications have been denied recently. If the actual process of submitting a Certificate of Need application can't be scrapped, then going forward, all of the applications should be approved.

Competition is good for consumers. It drives prices down. Businesses hate competition and often try to convince the government to step in and limit it. In this case, they were unfortunately successful.

Costs will never decline by restricting supply unless demand also declines, which, in the case of health care, it never will. That's basic economics.
Current Connecticut law provides that local health departments are required to perform 8 basic public health services, outlined in CT Agencies Regulations § 19a-76-2. The Connecticut Association of Directors of Health (CADH) seeks modification of this regulation. Specifically, it seeks to replace the current 8 mandated services with the 10 essential services of public, as described in Public Health in America (Public Health Functions Steering Committee. Public Health in America. Washington, DC: USPHS Office of Disease Prevention and Health Promotion; 1994.).

This modification is necessary to modernize current Connecticut public health law to accurately reflect the mission and essential services of public health. Since 1994, the 10 essential services have been the nationally recognized framework used to (1) explain what public health is, (2) clarify the role of public health within the larger health care system, and (3) provide accountability by linking public health performance to health outcomes.

CADH further proposes that the modified regulation be based on the Operational Definition of a functional local health department, published in 2005 by the National Association of County and City Health Officials (NACCHO). Revision is critical to ensure that, in this difficult fiscal climate, local health departments are operating within the framework developed by the Centers for Disease Control and Prevention and other key federal funders of state and local public health work in Connecticut.

In short, modification is necessary to ensure:

- Increased ease of applying for national public health department accreditation, which may become a prerequisite for accessing funds from the Centers for Disease Control and Prevention and other key federal funders of local public health work in Connecticut.
- Elimination certain mandates—like providing nutrition services and planning for genetic disease control—that most health departments in Connecticut cannot and do not fulfill.
• Maximum flexibility to towns to promote public health in the manner that best meets the needs of the local population served.

CADH has proposed language to replace the existing regulation.
<table>
<thead>
<tr>
<th>Susan Giacalone</th>
<th>Insurance Association of Connecticut</th>
<th>Hartford Insurance Dept</th>
<th>Homeowner’s Insurance Requirement</th>
<th>38a-824-3 (a)(2) &amp; (3)</th>
<th>Regulation 38a-824-3. Subdivisions (2) and (3) of the subsection (a) of the regulation should be eliminated or revised. These two provisions prohibit insurers from requiring homeowner’s to purchase homeowner’s replacement coverage in amounts above eighty percent (80%) of the replacement cost while also prohibiting limiting the sale of homeowner’s policies to eighty percent (80%) of the replacement value without offering coverage in amounts not less than the greater of the market value of the property or fifty percent (50%) of the replacement value. The two provisions impact an insurer’s ability to properly assess risk and manage its book of business while potentially encouraging homeowner’s to be underinsured, as evidenced with the recent natural disasters. These limitations are unique to Connecticut and do not exist in any other New England state.</th>
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I nominate the state’s wetlands regulations as a suitable candidate for modification because they fill 3 of the 4 characteristics that the governor has identified: “outdated . . . insufficient or ineffective.” Executive Order No. 37 § 1.

Sections 22a-39 -1 through 22a-39-13 have, for the most part, been unrevised since their promulgation in 1974. There have been 2 major revisions to the wetlands act, in 1987 and 1996, along with about another dozen less comprehensive amendments. The DEEP regulations do not reflect the current statutory program at all. They are misleading and downright wrong in numerous sections. Some sections the Attorney General’s office said would not be defended (I was an assistant attorney general from 1987-2006; for example, the invalidation of municipal regulations by DEEP exceeds DEEP’s statutory authority).

Moreover, the state of Connecticut has adopted no “upland review area” (URA). The state Supreme Court has upheld the authority of municipal agencies to adopt such areas. In a survey I undertook this fall, reviewing 95% of all municipal regulations, only 2 municipalities – and the state of Connecticut – have no established upland review area. Ironically, DEP issued a guidance document in 1997 providing a basis for establishing a 100 foot upland review area. The majority of towns (105), at DEEP’s urging, have adopted a 100 foot URA.

Adopting a URA is a defensive approach to an Appellate Court decision issued in 2003 in Prestige Builders, LLC v. Inland Wetlands Commission, 79 Conn. App. 710 (2003), cert. denied, 269 Conn. 909 (2004). The Appellate Court held that a wetlands agency was not authorized to exercise jurisdiction over activities that were outside the wetlands or watercourse, unless the agency had adopted by regulation an upland review area. Since 2003 DEEP and the Attorney General’s Office have urged municipalities to adopt certain language in their regulations to satisfy the Prestige Builders decision. According to my review this past fall, 118 towns adopted such a regulation. The DEEP has not heeded its own advice. It has no such protective regulation.
The DEEP has created model regulations for the towns to adopt—which the overwhelming majority of towns have done. The DEEP should take some of its own medicine. With relatively little effort DEEP could use the model regulations as a basis for crafting up-to-date regulations which would be effective and helpful to the public who wish to participate in state wetlands proceedings.
<table>
<thead>
<tr>
<th>Charles Bernier</th>
<th>Clinton Energy and Environmental Protection, Dept Of Energy</th>
<th>Carrying handguns in State Forests</th>
<th>Energy and Environmental Protection, Dept Of Energy</th>
<th>Carrying handguns in State Forests</th>
<th>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically:</th>
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<tbody>
<tr>
<td>- Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations</td>
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<td>- Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
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<tr>
<td>CCM Comments</td>
<td>[Comment Emailed with an attachment: &quot;CCM Comments - Obsolete Regulations.pdf&quot;]</td>
<td>Please see the attached document which references obsolete and burdensome regulations to towns and cities.</td>
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<td>Best,</td>
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<td>Mike Muszynski</td>
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<td>Senior Legislative Associate</td>
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<td>Connecticut Conference of Municipalities (CCM)</td>
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<td>900 Chapel Street, 9th Floor</td>
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<td>New Haven, CT 06510</td>
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<td>Phone: (203) 498-3064</td>
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<td>Fax: (203) 498-5832</td>
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_000_C3F713258265F941A04E075A24696F801FA591vmex2k10 CCMPRI_<
I wanted to write to you in support of online requirements for boater safety courses. Please see attached.

Regards

Peter Gumprecht

---

If a on line boaters license will help free up our state employee"s to perform other needed jobs, I am for it. There are only three things I wou ld like to driven into new boaters heads. Number one is for boaters to keep there proper distance from anchored boats and boats that are fishing along the shoreline. Number two is that of proper procedure of boat ramp use, te ach them not to tie up the ramp bu unloading and loading of there boats and vehicle on the ramp and to not stand in the middle of the ramps with their boats while loading them with people or supplies, but to move over to the side out of the way. And the third and most important is, please teach th em that all boat ramps are no wake areas if they have no wake markers or no t. Thank You

Thomas LaPorta

--2119117045-58382386-1387208154=:53956<
Attached are comments prepared by the CT Water Works Association in response to Executive Order 37.

Thank you for the opportunity to comment.

Elizabeth Gara
CWWA
Tel. 860-841-7350

--c6b0b570-b687-4b47-84c0-a51e20328f20<
Please see the attached comments submitted on behalf of the Connecticut Heating & Cooling Contractors Association in response to Executive Order # 37.

Please feel free to contact either myself or CHCC Executive Director Jennifer Jennings at (860) 533-1163 or jjennings@chcca.net with any questions or if we may provide you with additional information.

Thank you in advance for your consideration.

Sincerely,

Andy Markowski,
on behalf of CHCC

--

Andrew E. Markowski, Esq.
Statehouse Associates, LLC
Government Relations
304 W. Main Street, #205
Avon, CT 06001.
Cell: (860) 707-3620
Tel: (860) 256-8295
Fax: (860) 256-8296
aem@statehouseassociates.com
Contents of this communication may be privileged and/or confidential. If you have received this in error, please notify sender and delete from your system.

--001a1133fec68a858204edad25b5<
Attached are comments from COST relative to Executive Order 37.

Thank you for the opportunity to comment.

Betsy Gara
Executive Director
COST
1245 Farmington Ave., 101
West Hartford, CT 06107
Please see the attached comments from the Connecticut Leadership Council of the National Federation of Independent Business (NFIB), in response to Executive Order # 37.

Please do not hesitate to contact me to discuss further. Thank you in advance for your consideration.

Sincerely,

Andy Markowski
State Director
NFIB/Connecticut

--

Andrew E. Markowski, Esq.
Statehouse Associates, LLC
Government Relations
304 W. Main Street, #205
Avon, CT 06001
Cell: (860) 707-3620
Tel: (860) 256-8295
Fax: (860) 256-8296
aem@statehouseassociates.com

Contents of this communication may be privileged and/or confidential. If you have received this in error, please notify sender and delete
from your system.
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<th>Online Boating Course</th>
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<th>12/16/2013 5:17:46 AM</th>
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<tr>
<td></td>
<td>Please see the attached letter on this topic. Thank you for taking this into consideration.</td>
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</table>
Dear Ms. Decker,

Please add my concurrence to the comments of Margaret Miner of Rivers Alliance regarding review of regulations. It is always good to review regulations from time to time. Our committee, Program Review and Investigations, reviews state programs every year to determine the most efficient way to carry out the stated mission. We measure results using Results Based Accountability (RBA) techniques.

We must remember, however, that regulations that businesses might view as unnecessary or burdensome were set in place to protect vulnerable citizens, some living in areas highlighted by environmental justice campaigns, as well as the state’s quality of life. For example, we know that residents living near highways and certain manufacturing facilities have an elevated risk of cancer due to air pollution. We only have to look at China or Bangladesh to see the mistakes that are made when regulations are weakened.

We would be happy to discuss RBA with you if that would help the regulations review process.

Mary Mushinsky
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<th>Co-chair, PRI Committee</th>
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</table>
Please see the attached testimony concerning deletion or modification to obsolete state government regulations.

Respectfully submitted,

James T. Fleming
President
CAR Association
36 Trumbull Street
Hartford, CT 06103
Tel: 860-293-2500
Fax: 860-527-2582
email: jfleming@ctcar.org
Below are CBIA's Regulatory Comments in response to Executive Order 37. If you have any questions please feel free to contact me directly.

ENVIRONMENT

1. INCORPORATION OF THE REGULATORY TRANSPARENCY PROVISIONS OF EXECUTIVE ORDER #37 INTO THE REGULATION APPROVAL PROCESS.

CBIA is extremely pleased that the Governor included in Executive Order #37 provisions for improving administrative aspects of the regulatory adoption process in Connecticut. We believe these provisions will result in a more streamlined process and better outcomes for our state. To the extent applicable, these measures should be incorporated into the Regulation Review Committee's procedures for approving regulations. This could be done through legislation, through incorporation into the committee's rules, or a combination of both. There are many important and potentially impactful regulations currently under development at DEEP. CBIA would appreciate the opportunity to work with the Governor's Office and the legislature on this important initiative early in 2014.

2. PRELIMINARY ANALYSIS: Alignment of resources with regulatory priorities

As a first step to determining which regulations are "outdated, unnecessarily burdensome, insufficient, or ineffective," requires identifying existing state and federal legislative and executive mandates that require a disproportionate amount of resources relative to those activities that directly serve the agency's ability to address our most significant environmental challenges. Notwithstanding that this critical precursor analysis has not yet
been conducted, CBIA offers the following recommendations with respect to our current environmental regulations:

3. HAZARDOUS WASTE REGULATIONS - R.C.S.A. 22a-449(c)-100, et.seq.

Background/Issue: There is a longstanding frustration on the part of Connecticut industry regarding the complexity of the state's hazardous waste regulations. These frustrations stem from two primary sources. First, the degree to which Connecticut's regulations differ from federal requirements. Second, to the extent Connecticut's regulations reference federal regulations, those references are to versions of the federal regulations that are decades old. Our current state regulations, for example, refer to the 2001 federal regulations. Therefore, a Connecticut company seeking to be in compliance with state and federal hazardous waste regulations must not only comply with CURRENT hazardous waste regulations, but also must find a copy of the 2001 federal regulations, and substitute in a large number of state modifications to the language of those 2001 federal regulations. This is obviously extremely burdensome for Connecticut businesses.

Solution: Undertake a revision to Connecticut's hazardous waste regulations in a manner that 1) minimizes changes to the current federal regulations, doing so only where there is a compelling state interest; 2) clarifies that when federal regulations are updated, that references to federal requirements in our state regulations that are unaltered by state requirements shall be automatically valid commensurate with the federal update, or within a limited period of time following a federal update, unless or until the state modifies the updated federal language; and 3) provides the regulated community with a single document containing the language of the latest federal requirements as modified by any state-specific requirements.

4. SPILL REPORTING REGULATIONS
In 1971, the General Assembly mandated that an extremely broad array of spills (caused by accident or otherwise) by a broad array of individuals (including operators of any vehicles - including cars) be reported "immediately" to the state and, as of 1994, to the DEEP (then DEP). According to the statute, the reports are to contain information specified by regulations to be adopted by DEEP. Those regulations have never been adopted. Thus, businesses could only interpret the statute to mean that every spill, of any size, needed to be reported immediately. This resulted in a deluge of reports to the DEEP, the vast majority of which were very minor in nature. To help address this, the legislature amended the statute in 1995 to limit reportable spills to those "which pose a potential threat to human health or the environment." However, DEEP's interpretation is that they are the only entity qualified to determine if a spill poses such a threat. Therefore, businesses continue to operate "at risk" if they don't file a report with DEEP for every spill - no matter how minor. And the agency continues to get thousands of calls each year for very minor spills.

Solution: Adopt regulations, consistent with the regulatory transparency provisions of Executive Order #37 that establish simple and clear reporting thresholds for the most commonly spilled materials, based on the records of reported spills at DEEP (a surprisingly small list). These quantities should be based on the volume spilled for liquids and weight spilled for solids. For all other materials, there should be a minimum thresholds established, grouping these materials into a limited number of categories.

5. WATER DISCHARGE PERMITTING - R.C.S.A. 22a-430-3 and -4

The statutory foundation of these regulations is so overly broad as to place an impossible burden on DEEP. For example, subsection (a) of C.G.S. section 22a-430 requires a permit for, among a plethora of other similar absurdities, a person pouring a glass of water from their faucet onto the ground.

Solution: Revise subsection (a) of C.G.S. section 22a-430 to reduce the universe of discharges requiring a permit.
to those discharges that potentially pose a reasonably foreseeable risk to environmental quality or human health. Then revise R.C.S.A. 22a-430-3 and 4 in accordance with the revised statute and the regulatory transparency provisions of Executive Order #37.

6. GENERAL PERMITS HAVING THE POTENTIAL TO IMPACT 25 OR MORE CONNECTICUT BUSINESSES.

Background/Issue: General permits are useful tools for helping DEEP meet its enormously broad permitting obligations through the issuance of one document that imposes legal obligations on categories of businesses without having to develop and issue a permit one business at a time. However, some general permits place legal requirements on dozens or even hundreds of businesses and therefore constitute, in our view, de facto regulations[1] which DEEP can adopt with few, if any, protections provided under the Uniform Administrative Procedures Act.

For example, DEEP has issued several general permits associated with the discharge of storm water that are nearly 100 pages in length and bear no practical distinction from a regulation. Procedures for issuing such “statements of general applicability” should include at least some of the protections afforded under the Uniform Administrative Procedures Act, as well as the regulatory transparency provisions of Executive Order #37.

Solution: Declare by statute that environmental general permits that have the potential to impact 25 or more businesses are substantially similar to a regulation as defined by state statute, such that certain specified aspects of the Uniform
Administrative Procedures Act, as well as the regulatory transparency provisions of Executive Order #37 apply to their issuance. We're confident this approach would also have insured long ago that the many Connecticut businesses required to periodically test their fire protection systems could do so without risking a violation for discharging without a permit.

7. REGULATIONS CONCERNING THE RENEWAL OR MODIFICATION OF EXISTING PERMITS

Background/Issue: Current regulations concerning air, water, and other permitting unnecessarily burden both DEEP and regulated businesses in circumstances where a business is being transferred, expanded or upgraded. These circumstances require a permit modification but the current process is cumbersome, lengthy and expensive. Similarly, when a permit expires and is due for renewal, the same problems arise, even when little or no change has occurred at the permitted facility.

Solution: Modify the regulations concerning the renewal, transfer or modification of permits to significantly streamline the process where no significant change in activity is occurring or where such significant change will reduce the environmental impact of the activity.

8. EMERGENCY AIR POLLUTION EPISODES - R.C.S.A. Section 22a-174-6

Background/Issue: This regulation sets forth requirements for air pollution emergency episodes. It has not been updated since 1993, and to our knowledge, the emergency episode steps called for by the regulation have not been triggered in decades, if ever.
The Department should review the standards in the regulations to see if they are still appropriate. In addition, some of the steps called for under various emergency episodes need to be revisited. For example, if an emergency is triggered, no "incinerators" can be operated. Since Connecticut relies so heavily on resource recovery, shutting down all of these units could result in other health hazards. Moreover, the resource recovery facilities have modern air pollution controls that were not required when this regulation was initially adopted in the late 1970s or early 1980s.

9. PROCESS WEIGHT REGULATIONS - R.C.S.A. 22a-174-18(f)

Background/Issue: The origin of this regulation dates back to regulations adopted in California in 1949 and later revised there in 1959. Subsequently, this type of regulation was adopted by states across the nation before the Clean Air Act came into existence. The original purpose of this regulation was to control particulate emissions from certain industries that processed large volumes of material with exhausts that vented through point source discharges, all of which could be controlled with air pollution control equipment. It was not intended to address small emission sources, like welding operations, paint booths or abrasive blasting operations. Applying this regulation to all operations that are not process industries, as some DEEP personnel have suggested, would make certain activities, such as welding, illegal in Connecticut.

Solution: Section 22a-174-18(f) should be deleted as obsolete.

10. AIR INVENTORY STABILIZATION FACTOR (ISF) - R.C.S.A. 22a-174-26(4)(C)

Background/Issue: This regulation defines a fee assessed on businesses that operate under permits known as "Title V" permits, named after that section of the federal Clean Air Act. There are over 70 such businesses in Connecticut. The fee is created by federal law but Connecticut modified the
federal formula for determining the annual fee in a manner that has exponentially increased fees affected businesses must pay relative to other states.

The federal law calls for the fee to be determined by multiplying the actual emissions at the facility times a per ton fee - defined as $25 adjusted for inflation since 1989. The current per ton fee adjusted for inflation is $46.25. However, Connecticut places an additional factor into determining the fee, known as the Inventory Stabilization Factor (ISF). The ISF is based on a comparison of the total statewide actual emissions from stationary sources in 1990 divided by the total statewide actual emissions from stationary sources in the most recent calendar year. Ironically therefore, as Connecticut businesses continue to make improvements in lowering regulated emissions, the ISF serves to increase the fee. So in effect, businesses are penalized for improving air quality. The ISF has grown from 1.94 in 1997 to 14.11 in 2012. Fortunately, DEEP has exercised discretion making a final determination of an "appropriate" ISF. Currently, DEEP has subjectively assigned the ISF at 6.51. Nevertheless, this results in fees for affected Connecticut businesses of $301, times their facility's emissions - compared to affected facilities in other states now paying $46.25 times their facility's emissions.

Solution: R.C.S.A. 22a-174-26(4)(C) should be modified to place a cap on the ISF. For initial consideration, we would suggest the cap be limited to no more than 5% of the per ton fee. At the current per ton rate, this would allow for a maximum ISF of (46.25 x .05) = 2.31 yielding an adjusted per ton fee of $106.83.

11. E-GOVERNMENT AND ELECTRONIC SUBMITTALS

Background/Issue: Most environmental regulations include record-keeping and reporting requirements. CBIA appreciates the significant effort DEEP has made to incorporate e-government into its regulatory programs. We want to take this opportunity to encourage the agency to continue to make this a priority and to point out two examples of current programs where such innovation is urgently needed:
Community Right-To-Know, Tier II submittals. Having a statewide database, updated (via electronic submittal) annually and for modification as needed, and accessible by local authorities 24/7 would make better sense and have a significant impact. Not only does this eliminate paper and mailings, but it provides a method for the state to keep current inventories of all extremely hazardous chemicals.

This is less about our ability to compete and more about increasing the information our local emergency responders can access when deploying resources in an emergency.

Similarly, the annual requirement to submit a "Form R" under the program is now performed electronically using EPA's CDX internet-based system. Submitters essentially fill out the standard forms online. Each submittal is verified by the software then submitted electronically. However, the State of Connecticut requires submitters to print a hard copy of this data and submit it via US Mail as well.

Solution: Continue to expand E-government capabilities. For Tier II submittals, maintain a secure database for the collection of and controlled access to this information. For Form Rs, determine what, if any, value there is in collecting paper copies, then find a way to get that same value from the EPA's centralized system.
1. TAXES AND FEES ON ENERGY BILLS AND RENEWABLE REQUIREMENTS

Background/Issue: These fees (including RGGI, CL&M) are what, in large part, drives Connecticut’s energy cost to be higher here than in other nearby states and it will only get worse as our Renewable Portfolio Standards (RPS) become more aggressive. Additionally, the degree to which private-sector businesses benefit from these funds is unclear - as the data has not been assembled. However, there are clearly some major businesses in Connecticut that believe these taxes and fees only serve to make them less competitive with other states.

Solution: Accelerate transformation of energy efficiency programs from a rate-payer subsidy model to an open-market, privately financed model, and modify our RPS to be more in line with other northeastern states. In the interim, provide a better accounting of the dollars paid into these funds by manufacturers and other private-sector businesses compared to how much they receive from the funds.

RECOMMENDATIONS FOR REPEAL/MODIFICATION OF CT REGULATIONS:

LABOR:

31-19-1 - REPEAL
Employment of women between 1 a.m. and 6 a.m.
This section regulates the employment of women between the hours of 1-6 a.m., as well as the transportation facilities that must be available near the workplace in order to employ a woman at those hours. This section is outdated and has a basis in the false assumption that women are incapable of working the same hours as their male colleagues.

31-60-6 - MODIFY
Minors under the age of eighteen (wages)
This section is inconsistent with Connecticut General Statutes section 31-58(j) and should be modified. Section 31-58(j) allows employers to pay "learners, beginners, and person under 18 years of age" 85% of the minimum wage for the first 200 hours of employment. This is beneficial to employers and the
learners, beginners, and persons under 18 years of age be cause it makes it less expensive for an employer to take a chance on these inexperienced individuals. However, regulation 31-60-6 limits this to only the first job held by the learner, beginner, or person under 18 years of age. Therefore, if one of these individuals proved to be unable to be successful in their first job, a subsequent employer does not have the opportunity to give them a chance at the same temporarily discounted wage rate.

31-60-16 - MODIFY
Employee in a bona fide professional capacity (overtime)
This regulation should be modified to mirror corresponding federal regulations. Pursuant to 31-60-16(a)(1)(a), the regulation exempts from overtime requirements professionals who have obtained advanced knowledge in a field of science, or learning acquired “by a prolonged course of specialized intellectual instruction and study.” In other words, an employee’s exemption from overtime requirements is based on formal schooling and degree status.

Conversely, federal regulations recognize work experience and do not rely solely on degree status. In order for an employee to be exempt from overtime requirements under the corresponding federal regulations, they need “advanced knowledge through a combination of work experience and intellectual instruction.”

The state regulation should be modified because as currently written, it yields impractical results. For example, an engineer who has been doing that work for 30 years with only an associate’s degree is not exempt from the state overtime laws, whereas a newly hired colleague who is a recent college graduate with a bachelor’s of science degree in engineering would be exempt under the law. The work experience of a person who has been performing the job should be taken into account.

31-222-6 & 31-222-7 - MODIFY
Employers becoming subject who were not previously subject & payment of contribution (Unemployment)
These sections reference an employer giving notice to the
unemployment compensation administrator within 15 days of becoming subject to the unemployment compensation act. Public Act 13-288 changed that threshold from 15 days to 30 days.

31-236-26d - MODIFY
Absence from work
This section establishes that three instances of no-call, no-show unexcused absence at work can result in an employee's termination for willful misconduct. However, rather than have each day of unexcused absence be considered a single instance, the labor department has defined one instance as being "one or two consecutive days." In other words, according to the chart in this regulation, an employee has not engaged in three "instances" of unexcused absence until they have missed 5 or 6 consecutive days of work. The business community suggests that each day of unexcused absence should count as a single instance of unexcused absence.

31-250-8 - MODIFY
Requirements and administrative procedures for a voluntary shared work unemployment compensation pilot program.
This section allows any unit of four or more employees of a particular employer to participate in the highly successful shared work program. The business community suggests allowing participation of any unit of two or more employees rather than the current four or more employees. This would allow more small businesses to participate in the program and give them additional options in their efforts to retain workers and avoid layoffs.

TRANSPORTATION: 14-270-18 - MODIFY
Restrictions on travel time
This regulation prevents oversize or overweight tractor trailers from traveling on state roads between sunset and sunrise, on Saturday, Sundays, holidays, and up to a half-day before each holiday. Ultimately, these restrictions severely limit a tractor trailer's ability to deliver products, machinery, or large equipment during months where there are several major holidays. The result is more highway congestion issues as these tractor trailers are forced to travel during rush hour times.
during a few fewer number of weekdays. A pilot program was put in place during 2013 by ConnDOT that allowed oversized/overweight vehicle travel during Saturdays and Sundays from daylight until noon. This gave pilot program manufacturers or large goods, such as laser cutting machines, additional time to deliver their products to customers. Additionally, it resulted in less oversized or overweight tractor trailers from being on CT roads during any given day.

Bonnie D. Stewart, Vice President & Counsel, CBIA
350 Church St, Hartford, CT 06103
(W) 860.244.1925 - (M) 860.944.8788 - (F) 860.244.8481
Bonnie.Stewart@cbia.com - www.cbia.com
Twitter @CBIAbonnie - LinkedIn
www.linkedin.com/in/bonniestewart/

[1] See, 4-166(13) which defines a "Regulation" as, "each agency statement of general applicability, without regard to its designation, that implements, interprets, or prescribes law or policy, or describes the organization, procedure or practice requirements of any agency. . ."=20(Emphasis added).
Home Health and Hospice regulatory recommendations

[Comment Emailed with an attachment: "Regulatory Revision Recommendations 12.16.13.pdf"]

On behalf of the licensed and certified CT home health and hospice providers, the CT Association for Healthcare at Home submits the attached recommendations for updates/revisions to the current DPH Home Health Care Agency regulations, the DSS Provider Manual for Home Health and the DSS Provider Manual for Hospice.

[https://m360.cthealthcareathome.org/CONTENT/3277075/TracY.jpg]

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12/16/2013 9:14:51 PM
Good afternoon,

My name is Brunilda Ferraj and I work with the Connecticut Community Providers Association (CCPA). Attached please find CCPA’s comments regarding Governor Malloy’s Executive Order #37. If you have any questions, please do not hesitate to contact me at bferraj@ccpa-inc.org or 860-257-7909.

Thank you,
Brunilda

Brunilda Ferraj, MSW
Public Policy Specialist
Connecticut Community Providers Association (CCPA)
35 Cold Spring Rd, Suite 522
Rocky Hill, CT 06067
860-257-7909 (P)
860-257-7777 (F)
bferraj@ccpa-inc.org
www.ccpa-inc.org
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<td>David Ladasky</td>
<td>Southbury</td>
<td>Energy and Environmental Protection, Dept Of</td>
<td>23-4-1(c) and 26-66-2</td>
<td>Please modify the State Agencies Regulations to allow individuals with valid Permits to Carry Pistols and Revolvers to carry a handgun for self defense while in CT State Parks and Forests. Specifically: - Remove the prohibition on the 'carrying of firearms' in Section 23-4-1(c) of the Connecticut Agencies Regulations - Add an exemption to 26-66-2 to allow the carrying of pistols and revolvers (including handguns using center-fire ammunition) for the purposes of self defense.</td>
<td>12/18/2013 12:40:48 AM</td>
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<td>Stephen Maroney</td>
<td>West Hartford</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>Francis Manzi</td>
<td>Hamden</td>
<td>Energy and Environmental Protection, Dept Of</td>
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<td>12/18/2013 12:40:37 PM</td>
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From: Michael J. Knight
Sent: Saturday, October 19, 2013 6:48 AM
To: 'governorregulations@ct.gov'
Subject: regulation change . really?

Let's talk about how collections in the state dept of revenue have no collection policy. Even IRS has rules that are easy to follow.

Let's talk about the viciousness with which front line collection people pursue taxpayers. (see #1 above for part of reason why).

Let's talk to pat hicks about 1 and 2 above in a recent case.

Let's talk about a recent case where CT whipsaws the taxpayer such that a tax paid in New York for a CT resident is not credited against the CT adjustment.

Let's talk about the viciousness of the dept of labor auditing a very small business for three years with one employee.

Let's talk about how the dept of labor and the workmens comp insurance industry is in cahoots together to drive out independent contractors in CT.

Let's talk about home health care industry and independent contractors.

Let's talk about the carpenters union working with you to drive out independent contractors in CT.

Let's talk about how being an independent contractor in CT is a CLASS D felony.

So do you think I think we will talk? I doubt it.

Let's talk about retroactive tax increases, wrong instructions to payroll companies and vicious warnings to taxpayers about underpayment tax penalties.

Michael J. Knight, CPA, CVA, CFE

- Let's talk about unemployment compensation fraud and borrowing from the feds
- Let's talk about how regulation reformer Malloy goes to bat for the unions in Memorial hospital case

As always we thank you for your patronage and referrals!
Sweeping change happening fast

Hospital faces squeeze from budget, union

Associated Press

Lawrence + Memorial Hospital in New London, which is losing millions of dollars because of government spending cuts, has another adversary in a union aggressively negotiating contracts for about 800 nurses.

Adding to the hospital's difficulties is pressure from Gov. Dannel P. Malloy, who wrote to CEO Bruce Cummings last week, urging him to "take every possible step" to negotiate a new contract before the current agreement expires in November.

L+M, a 260-bed hospital founded in 1912, bought Westerly Hospital in Westerly, R.I., for $59 million last year and opened a $34.5 million cancer center in Waterford in September with Dana-Farber Community Cancer Care. Yet it faces tight finances because of federal and state health care spending reductions, spokesman Michael O'Farrell said.

Cuts in the most recent budget passed this year by the Connecticut legislature and signed by Malloy will amount to $18 million in two years for L+M, Cummings said. Other spending cuts are part of federal Medicare and Medicaid funding, the extension of Bush-era tax cuts and automatic federal cuts that took effect in March.

In addition, L+M says it and other hospitals are losing revenue with falling patient volume due to the weak economy, fewer employers offering health insurance and a shift to high deductible health plans, forcing beneficiaries to reconsider hospital visits.

"Everything is different right now," O'Farrell said. "There's a sweeping change coming through and it's happening fast."

The hospital laid off 60 workers in the past year, about a percent of its 2,800 employees. Hours were reduced for 15 more employees.

The National Labor Relations Board is siding with AFT Connecticut, which represents the registered and licensed practical nurses seeking a new contract, over accusations that the hospital established different medical organizations, or "alter egos," to displace the work of union members. The union accused L+M of using the new medical groups to hire lower paid workers, replacing laid-off employees.

The Boston region of the NLRB determined that the hospital transferred work to other entities, spokesman John Cotter said. The federal agency said the "various entities" were a single business enterprise and a single employer as defined by federal labor law.

The hospital says it's confident its actions "have been entirely proper and lawful" and said the NLRB decision was not based on merits.

The matter heads to an administrative law judge. A hearing date has not been scheduled.

Matt O'Connor, spokesman for AFT, accused hospital officials of giving conflicting views of their financial position, depending on the situation. The hospital warned of Connecticut budget cuts but told Rhode Island health officials that the hospital's finances were strong enough for it to buy the Westerly Hospital, he said. "They're talking out of multiple sides of their many mouths," O'Connor said.

Malloy wrote to Cummings on Thursday that he has "deep concerns" about the health care, employment and community service practices at Lawrence + Memorial and its related entities. He sided with the union on the issue of "alter egos," telling the CEO that that "appears to be a legal maneuver" to avoid pay and benefits required by the contract.

In response, Cummings said Malloy "refers to serious and complex issues that are better discussed in a non-political manner."
Michael J. Knight

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Michael J. Knight, CPA, CVA, CFE

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As always we thank you for your patronage and referrals!

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Dear Governor Malloy,

You speak as if you are interested in helping small business owners. Your words don’t follow your actions.

We own a small retail outlet that happens to sell cigarettes, as thousands of other families do. On July 1st 2013 you had signed into law a sales tax on “our cost” of cigarettes. It’s apparent that you never owned or operated a retail outlet that was subject to collecting sales tax for the State. The State’s reasoning for this was to help prevent fraud. This couldn’t be further from the truth. The State really wanted to collect 90% of the tax money earlier.

If the State wanted to prevent fraud, all they had to do was have all the “licensed” cigarette wholesaler’s provide for the State, a dollar amount that was sold to each “licensed” retailer as the Beverage Alcohol Industry did a number of years ago. Instead you impose a 6.35% sales tax on the cost of a product that could sit on our shelves for a number of months before they are sold. These early out of pocket dollars could have helped pay for other purchases.

You have to agree that this is not a very friendly way of doing business in the State of Ct. This should be repealed as quickly as it was signed into law. To the best of my knowledge this is the only product that has incurred such an injustice.

Hopefully you will address this issue.

Regards

Paul A Baudouin
November 24, 2013

Governor.regulations@ct.gov,  David.Alexander@cga.ct.gov

John.A.Kissel@cga.ct.gov

I am a 61 year old small business owner in the State of Connecticut for over 20 years.

I am a licensed cosmetologist, and a salon owner. I have been the owner and Sole operator for all these years, starting my business from scratch with barely a dime in my pocket.

Within my salon business, I offer Hair and Skincare, as well as Healing Energy Treatments (Jin Shin Jyutsu). I have been Certified as a practitioner for many years after attending over 5 training sessions. Each training session is a week long Intensive consisting of daily 8-10 hour long classes. The training is expensive and requires travel and lodging where the training is offered. I have invested a lot of time and effort into this training.

I understand that the State Of Connecticut is now going to require a license in Massage Therapy to practice this healing modality.

I know that other states, such as New Jersey, have a separate test and license for practitioners of Body Energy Work such as Jin Shin Jyutsu and Reiki and the like.

Massage therapy training is very expensive. $5000.00 and up depending on the school.

It also requires me to close my business to take these classes. Very difficult since I work alone.

I have begun classes at a local college but the time and expense is an extra burden especially at this point in my career. Other practitioners are experiencing the same problem.

Since I am approaching retirement age, I would like to restructure my business, but these new requirements just keep making it harder and harder to survive and run a successful business.

Why not rethink your plan with grandfathering or different licensing for practitioners of these different Types of treatment, which by the way do not require a client to disrobe or be massaged in any way?

Thank you for your consideration, Maureen E. Griffin

Ps: I also hold a Real Estate Broker License in our state
Duplicative Regulations:

Recommend the following five Public Health Code Regulations be repealed; governance is duplicated under 19-13-B42 (most current regulation that incorporates the sanitary aspects of ALL food related industry and general sanitation)


5. 19-13-B49: Catering and food service (effective date 10/3/2005)

KEEP: 19-13-B42: Sanitation of places dispensing food or beverages (Revision date 7/3/2007)
December 10, 2013

The Honorable Governor Dannel P. Malloy
Office of the Governor - State Capitol
210 Capitol Avenue
Hartford, CT 06106

Re: Executive Order No. 37 – Request to Amend the Regulations of the Connecticut Department of Motor Vehicles

Dear Governor Malloy,

Our firm represents the Towing & Recovery Professionals of Connecticut (hereinafter “TRPC”), which is a non-profit trade association that fosters and promotes the interest and welfare of all towing, recovery, and storage operators within the State of Connecticut. This organization has been in existence since 1980 and presently has over 200 hundred members from across the State of Connecticut.

Members of the TRPC provide vital and indispensable services that directly affect our state’s economy. Members of the TRPC provide towing services, recovery services, maintain a fleet of very expensive, heavy equipment capable of recovering large trucks and tractor-trailers after accidents as well as the recovery of passenger vehicles from crash sites. Members of the TRPC respond to accidents and other highway emergencies which result in highway shutdowns. Such closures lead to secondary accidents, which cause congestion when traffic is diverted onto secondary roads. Significantly, Connecticut commerce and industry are disrupted for days due to delayed shipments and temporary road closures. Many of the situations in which the TRPC members respond are known as “nonconsensual” tows or situations where local or state police call the towing company to clear the highway.

Currently in Connecticut, there is extensive and burdensome regulation of the towing industry at the state and municipal level. Some of the regulations of the Connecticut Department of Motor Vehicles (hereinafter “the Regulations”) exist in stark violation of federal law. In particular, federal law precludes all regulation of charges for towing services under the authority of the interstate commerce clause. There is a very narrow exemption for nonconsensual tows. Connecticut’s regulations significantly exceed the exemption. Consequently, the Regulations increase the cost of doing business in the State of Connecticut for towers.
In particular, 49 U.S.C. § 14501(c)(1)(c) preempts the state regulation of a consensual tow, which is a tow ordered by the vehicle owner. Clearly, Congress passed a specific exemption for a nonconsensual tow that allows states to “enact or enforce a law, regulation or other provision relating to the price of for-hire motor vehicle transportation by a tow truck, if such transportation is performed without the prior consent or authorization of the owner or operator of the motor vehicle (emphasis added). Through this narrow exemption, Congress made explicit that it would not preempt state regulation of the price of motor vehicle transportation by a tow truck for nonconsensual tows.

The legislative history of 49 U.S.C. § 14501(c)(2)(C) makes clear that Congress intended to permit state regulation of only the price of the tow by a tow truck and for the transportation only. The House Report accompanying the proposed version of § 14501(c)(2)(C) states that the purpose behind the exemption is to provide “a new exemption from the preemption of State regulation of intrastate transportation relating to the price of non-consensual tow truck services. This is only intended to permit States or political subdivisions thereof to set maximum prices for non-consensual tows, and is not intended to permit deregulation of any other aspect of tow truck operations. The Committee had been asked to go farther and permit State and political subdivisions thereof to re-regulate all aspects of nonconsensual tow truck services. The Committee provision struck a balance between the need to protect consumers from exorbitant towing fees and the need for a free market in towing services.”

In spite of § 14501(c)(2)(C) and its legislative history, the Connecticut Department of Motor Vehicles (hereinafter “the Department”) is regulating both nonconsensual tows and associated services. When a nonconsensual tow is required, towers must often provide additional services associated with the nonconsensual tow. Such associated services include the recovery of the vehicle, use of specialized equipment, safety personnel, site restoration, cleaning any equipment used in connection with the nonconsensual tow, and any preventative measures taken with respect to possible environmental contamination. Presently, the Department is regulating these exact services and many others. The exemption in § 14501(c)(2)(C) prohibits the Department from regulating these associated services. The current regulatory scheme must be amended to reflect the limitations of the narrow exemption to full federal preemption.

Furthermore, the Department continues to violate Connecticut General Statute §14-66. This section only permits the Commissioner of Motor Vehicles to regulate nonconsensual tows, yet the Commissioner has gone beyond its statutory mandate by regulating what is known as “recovery.” Recovery and nonconsensual tows are distinct. Specifically, Sec. 14-63a-36b(8) defines “recovery” as “winching and other similar functions...necessary to return a motor vehicle to a position where a nonconsensual tow can be initiated.” In fact, one member of the Department has even admitted in sworn testimony that §14-66 only permits regulation of nonconsensual tows.

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1 49 U.S.C. § 14501(c)(1)(c) reads in relevant part that “except as provided in paragraphs (2) and (3), a State, political subdivision of a State, or political authority of 2 or more States may not enact or enforce a law, regulation, or other provision having the force and effect of law related to a price, route, or service of any motor carrier...with respect to the transportation of property.”


4 Conn. Gen. Stat. §14-66 reads in relevant part that “The commissioner shall establish and publish a schedule of uniform rates and charges for the nonconsensual towing and transporting of motor vehicles...”

5 On April 17, 2013, Attorney Kenneth Votre elicited the following sworn testimony from Lieutenant Christopher Smith at a Department of Motor Vehicles administrative hearing:

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2 COHEN AND ACAMPORA - ATTORNEYS AT LAW
On account of the current regulations, providing recovery and associated services can be enormously expensive to members of the TRPC. For example, our firm represented a member of the TRPC in connection with a complaint issued by the Department. On February 28, 2012, the towing company responded to a severe accident in which a passenger vehicle flipped over a guardrail, rolled down an embankment, and caused power lines to collapse over the accident site. They provided a lighting truck to illuminate the accident site, a Heavy Duty Wrecker to lift the vehicle over the guardrail, a flatbed to transport the vehicle, a Heavy Rescue truck for carrying necessary tools, and a Site Restoration Unit to clean battery acid that had leaked onto the road. Moreover, the towing company's personnel cleaned the road and embankment as there was substantial debris from the accident. It took the member company 3 ½ hours to complete its work, utilizing eight (8) pieces of equipment and five (5) employees.

Based on the equipment and associated services it provided, the towing company generated an invoice in the amount of $6,222.25 and forwarded it to Geico Insurance Company (hereinafter “Geico”) for payment. Geico filed a complaint with the Department claiming that the invoice was excessive. The Department issued a Consumer Complaint Analysts Report, recommending that the “matter proceed directly to a hearing” as the towing company had allegedly overcharged Geico by $5,808.00. After reviewing the Regulations, the Department took the position that the towing company was only entitled to $414.25. Unfortunately, this is only one of many instances where the Department has expected members of the TRPC to bear the expense of providing essential services to the Public.

Members of the TRPC invest hundreds of thousand of dollars buying equipment necessary to perform recovery and other associated services. Such equipment includes but is not limited to flatbeds, Heavy Duty wreckers, chainsaws, trailers, power brooms, lighting trucks, spreader bars, box trailers, and Heavy Rescue trucks. The Regulations materially limit what members of the TRPC can charge for their services, which, depending on the severity of the accident, can cost thousands and thousands of dollars. Consequently, members of the TRPC must bear the cost of providing these associated services which makes it extremely difficult to accomplish a return on their sizable investment. It should be noted that if private businesses did not invest in trucks, equipment, and personnel, the State of Connecticut would be at a disadvantage in clearing highway accident sites.

In order to stop these violations of federal law, we have represented the TRPC and its members in multiple administrative hearings at the Department. Right now, we are appealing an adverse decision of the Department to the Superior Court of New Britain, Modzelewski's Towing and Recovery, Inc. v. State of Connecticut-Department of Motor Vehicles, HHB-CV-13-6021098-S.

Q: And so when you talked about the distinction between recovery and nonconsensual towing, the nonconsensual towing begins at the time the vehicle is returned to the roadway to be towed?
A: Yes.
Q: So you and I don't disagree that the recovery in this case is not part of the nonconsensual tow?
A: Recovery is different.
Q: It is not part of the nonconsensual tow?
A: Correct.
Q: And you don't disagree that 14-66 only permits the DMV to regulate the nonconsensual tow?
A: Yes. That's what it says.
We are prepared to appeal any unfavorable decision to the Connecticut Appellate Court, the Supreme Court of Connecticut, and beyond if necessary. The honest and hardworking towers in the State of Connecticut should not be required to bear the cost of litigation in order to force the Department to comply with federal law.

Based on the objectives of Executive Order No. 37, we believe that an in-depth examination of the Connecticut Department of Motor Vehicle Regulations—particularly those referenced herein—is both deserving and overdue. By virtue of the administrative hearing juggernaut, the Department of Motor Vehicles is enforcing regulations that violate both state and federal law. The administration of these hearings is enormously expensive to both the State of Connecticut and towing companies. Moreover, towing companies are forced to absorb certain costs that should ultimately be born by the vehicle owner, its operator, or insurance carrier. The de-regulation of the towing industry was intended to decrease the cost of doing business. Unfortunately, the opposite has occurred.

We respectfully encourage you to review the Regulations, particularly § 14-63-36a, §14-63-36b, and §14-63-36c. As the Department continues to violate state and federal statutes, there is an urgent need to address these regulations and ultimately amend them in order to conform to the federal law. In particular, the Connecticut’s regulation of nonconsensual tows must be strictly limited to the parameters of the exemption to preemption established by Congress and the Department must recognize its limitations. In addition, we believe that such an amendment would be financially beneficial to the State of Connecticut in reducing the unnecessary expense of administering hearings, and allow Connecticut towing companies to successfully operate in the absence of restrictive and illegal regulations.

The TRPC and its members provide services that are vital to the safety and welfare of the Public. As a consequence of the present Regulations, these services are required to be provided at a break-even or loss situation due to the cost of operation and the equipment involved. Therefore, the Regulations are required to be amended in order to keep pace with the cost of modern day operating expenses and to give credence to the distinction between recovery and nonconsensual towing. The TRPC and its members will be unable to stay in business under the present Regulations, which are in violation of state and federal law.

We would welcome the opportunity to discuss this matter in person at your convenience. If you should require any additional information, please do not hesitate to contact us.

Thank you for your anticipated assistance.

Very truly yours,
COHEN AND ACAMPORA

By, John A. Acampora

COHEN AND ACAMPORA - ATTORNEYS AT LAW
U.S. Supreme Court Places Its Thumb On The Land Use Scale

By: Tim Hollister, Joe Williams, Chris Smith, Matt Ranelli, and Beth Critton

Somewhat lost amid the tumult of U.S. Supreme Court decisions on same-sex marriage, affirmative action, and voting rights, was the unusual specter of the Court weighing in on the conduct of local and state land use proceedings, and issuing a decision that not only favors the property owner, but also describes property owners seeking permits as “vulnerable to government extortion.”

Koontz v. St. Johns River Water Management District, issued June 25, 2013, is a once_in_a_generation decision, for its subject matter, outcome, and tone. This article summarizes the decision and its likely impact on land use proceedings.

The Koontz backstory is that in 1987 and 1994, the Supreme Court established what became known as the “Nollan / Dolan doctrine,” which holds that “exactions,” which are permit conditions imposed by a municipal, regional, or state agency, must provide a “nexus” – a logical connection between the impact of the proposed land use and the condition that tries to mitigate that impact – and “rough proportionality” – some measurable balance between the land use impact and the condition imposed by the permit.

In Nollan (1987), the Court struck down a requirement that a property owner grant the public an easement to cross his oceanfront lot as a condition of a permit to build a house, holding that the application did not justify requiring public access, even along a beach.

In Dolan (1994), the Court invalidated a requirement that a property owner, who wanted to build a plumbing supply store, dedicate an easement across her land for a public bike trail.

Nollan / Dolan thus established a minimum national standard for exactions, a standard rooted in the Takings Clause of the Fifth Amendment to the U.S. Constitution, which allows government to take interests in private property only for public use and only upon paying just compensation. Since 1994, state courts and lower federal courts have raised and resolved differently two questions not answered by Nollan / Dolan: does the requirement for nexus and rough proportionality between the proposed land use and the condition apply when government makes demands on a property owner who refuses them, such that the permit is then denied? And does Nollan / Dolan apply when the government, instead of demanding an interest in land such as an easement, requires money?

Koontz owned 14 acres of vacant land near Orlando and sought a permit from the Water Management District to improve three of his acres. In exchange, he offered to preserve his remaining 11 acres as open space, but the District pressed Koontz for more, asking him to develop one acre and dedicate 13, or pay the District to enhance 50 acres owned by the District and located several miles away. Koontz refused both demands. The District then denied his permit. Koontz sued the District in state court under state law to try to get his development approved, but asserted that the District’s proposed conditions violated federal law, Nollan / Dolan. In its June 25 decision, the Supreme Court said “yes” on both unresolved questions: Nollan / Dolan applies where a permit applicant refuses the conditions and the agency denies the permit, and it applies where the government’s demand is for money, not property. Thus, the Court confirmed the broad scope of Nollan / Dolan as a protection of property rights, arising from the Takings Clause. But it is the Court’s explanation of these results that is extraordinary. The Court described Nollan and
Dolan as reflecting “Two realities of the permitting process.” The first, it said, is that (emphasis added) “land_use permit applicants are especially vulnerable to . . . coercion” because “the government often has broad discretion to deny a permit that is worth far more than property it would like to take.” In other words, a property owner, engaging in old-fashioned free enterprise by seeking a way to enhance the value of its land by obtaining a permit to develop it, is often at the mercy of government officials interested in extracting more of the enhanced value than is justified by mitigating the actual impacts of the proposed land use. “By conditioning a permit on the owner’s deeding over a public right_of_way, for example, the government can pressure an owner into voluntarily giving up property.” The second reality is that land uses often impose costs on the public that government may rightfully offset, such as by requiring dedications of land. Nollan/Dolan, the Court observed, aligns these two realities by allowing exactions but requiring anexus and rough proportionality; thus, it allows the government to force property ownersto mitigate the actual impacts of their own activities, but restrains it from arbitrary action, regulatory overreaching, or outright extortion. The Court’s observation about an imbalance of power in land use proceedings is not news to property owners. But the Court’s repeated use of the word “extortion” to describe a possible outcome of land use permit proceedings, and its characterization of land use permitting as often involving flagrant misuse of the unequal bargaining power between the applicant and the government, are by any measure unprecedented and breathtaking – the Court putting a federal thumb on the side of property rights in proceedings that are mostly a creature of state and local law.

The decision’s second reverberation is its description of permit conditions/exactions that fail the nexus/proportionality test as essentially a misuse of the power of eminent domain, a direct (or “per se”) violation of the Fifth Amendment’s Takings Clause, as opposed to a so-called “regulatory taking.” The Court explained that the test for whether an exaction is unconstitutional is whether that condition, if issued by the land use agency as an administrative order rather than as a demand added to a permit, would require payment of just compensation. Thus, when the Water District demanded that Koontz dedicate 13 of his acres as open space to obtain a permit to develop the rest of his land, the question was whether, if the agency did this by direct order instead of permit condition, it would have “taken” the property, requiring payment of compensation. (It likely would.) Thus, the Koontz decision directs that the exactions are, or are at least closer to, direct condemnation/eminent domain, than to government “regulatory takings” (destroying a property’s value through excessive regulation). As is often the case after a broadly-worded decision like Koontz, in the immediate aftermath, property owners and property rights advocates declared resounding victory, while government officials described apocalypse. The reality, however, is that the decision will now play out during the next few years as owners, regulators, and courts try to apply the decision to real-life situations. The impact will be neither revolutionary nor catastrophic. (In fact, the Court clarified the breadth of Nollan/Dolan protections, but did not rule on the merits of the Koontz development, which is based on Florida, not federal, law.) So, we expect Koontz, over time, to have the following consequences:

1. First and foremost, land use agencies will need to think twice about conditions and demands imposed on permits, because it is now clearer that any demand that is not based on a solid logical nexus and rough proportionality will be suspect, and in the most egregious cases of agency overreaching, property owners will have a stronger, clearer basis to challenge agency action and potentially to sue for just compensation.
The decision strengthens the hand of property owners who have the stamina, time, and resources to challenge permit conditions, by broadening the legal analysis and bringing exactions clearly under the federal Fifth Amendment; the holding solidifies a third type of Takings Clause protection of property owners, in addition to prohibiting takings that are not for public use and takings without payment of just compensation.

Specific types of government permit conditions / exactions that will now require more careful scrutiny include: open space dedications, utility upgrades, road improvements, anything off-site, anything on the government’s own land, anything involving money (such as fees_in_lieu), and anything that stretches logic and proportionality beyond reason. All of the above said, the realities are, and will remain, that property owners and developers will still be pressured to accept – and often will accept – unreasonable demands where there is more value to them in accepting than fighting. Constitutional challenges to permit conditions will still be expensive, time-consuming, and reserved for the most egregious situations. The Koontz decision will likely change the tone of land use proceedings involving permit conditions by allowing land owners and their representatives to challenge a broader range of demands, while causing government agencies to consider exactions more carefully.

Going back to our start, it is an extraordinary day when the U.S. Supreme Court puts its thumb directly on the state, regional, and local land use scale, and in Koontz it unmistakably did so. The decision will require government officials to consider more carefully the conditions they impose on permits and in some cases, the decision will give property owners a broader and clearer legal basis to challenge those conditions.
Dear Senator Kissel,

I am writing to you in response to your recent mailing to businesses. First, I want to commend you for giving me this opportunity to express my views on state regulations and laws. I have never seen a state Senator solicit this type of information.

Yes, I AM sick of burdensome state regulations and laws which are harming my business. As a builder and developer I am subject to many regulations. Three of the most onerous State statutes that have caused me a lot of problems, expense, and delay are as follows:

1. **Sec. 8-25.** Subdivision of land. This section of the statute needs clarification. It is apparent to me that the drafters of this statute had in mind that the developer would give 10% of his land to the Town as open space. The statute talks about the value of the open space not exceeding 10%. However, the amount of open space should also not exceed 10%. The statute is not clear in this regard. Some towns have abused this lack of clarity and have taken more than 10% of one’s land without just compensation. This is not right and illegal under federal law. I propose amending the statute by adding the *underlined and italicized* words to the statute as follows:

   Sec. 8-25. Subdivision of land (a) No subdivision of land shall be made until a plan for such subdivision has been approved by the commission. .... Such regulations shall also provide that the commission may require the provision of open spaces, parks and playgrounds, when, and in places, deemed proper by the planning commission, which open spaces, parks and playgrounds shall be shown on the subdivision plan; and the total area of such open spaces, parks and playgrounds shall not exceed ten per cent of the area of the land to be subdivided. Such regulations may, with the approval of the commission, authorize the applicant to pay a fee to the municipality or pay a fee to the municipality and transfer land to the municipality in lieu of any requirement to provide open spaces. Such payment or combination of payment and the fair market value of land transferred shall be equal to not more than ten per cent of the fair market value of the land to be subdivided prior to the approval of the subdivision. The fair market value shall be determined by an appraiser jointly selected by the commission and the applicant. A fraction of such payment the numerator of which is one and the denominator of which is the number of approved parcels in the subdivision shall be made at the time of the sale of each approved parcel of land in the subdivision and placed in a fund in accordance with the provisions of section 8-25b.

2. **Sec. 8-18 Definitions.** In this section the definition of *cluster development* has caused me great expense, problems, and delay. The definition reads in part: *Cluster development* means a building pattern concentrating units on a particular portion of a parcel so that at least one-third of the parcel remains as open space to be used exclusively for recreational, conservation and agricultural purposes except that nothing herein shall prevent any municipality from requiring more than one-third open space in any particular cluster development; ....

This statute is being abused by some towns. First of all the developer should have the choice, not the mandate, that a *cluster development* be proposed. One local Town demands that such *cluster development* be used if the parcel to be developed exceeds 10 acres or 5 lots, and they require 50% open space. And what do I receive in return? Only the right to make smaller lots, but not more lots than I would otherwise get, and the mandate that I set the houses back 100' (instead of the customary 50') from an existing road. This is a *taking* without just compensation, illegal under federal law. If I have a 12
acre parcel I have to give away 6 acres of my land for the right to develop the remaining 6 acres. This statute must be changed! It should state that a cluster development can be proposed at the developer’s option; and that the amount of open space to be set aside will be at least one-third, with no requirement that it be more than one-third. One Town is using this statute to circumvent their own zoning regulations, thwart development, and block more reasonably priced housing. We need to change this onerous statute!

3. **Sec. 8-18 Definitions** I have recently had a disagreement with a nearby Town over the definition of the word “subdivision” as it is used in zoning matters. I wanted to subdivide only 10 of my 32 acres but the Town insisted that the remaining 22 acres constituted a building lot, even though it lacked the required frontage. I had a written opinion from the well-respected zoning attorney Timothy Hollister from Shipman & Goodwin supporting my position, but the town would not agree and caused me to incur extra expense and lost time in my pursuit of a simple subdivision application that proposed all of the lots on an existing street. Can you imagine if you owned 500 acres and wanted to give each of two children a 1 acre building lot? The town would claim you really had 3 lots, one of them being 498 acres in size? Then they would demand an inordinate amount of that land to be given to the town as open space. This is absurd! To alleviate such problems with other developers throughout the State, I propose that the definition be amended by adding the words shown in italicized and underlined and deleting the two words “sale or” in Sec. 8-18 as follows:

Sec. 8-18. Definitions. As used in this chapter: "Commission" means a planning commission; "municipality" includes a city, town or borough or a district establishing a planning commission under section 7-326; "subdivision" means the division of a tract or parcel of land into three or more parts or lots made subsequent to the adoption of subdivision regulations by the commission, for the purpose, whether immediate or future, of "sale or" building development expressly excluding development for municipal, conservation or agricultural purposes, and excludes parts or parcels labeled "NOT A BUILDING LOT" on a proposed subdivision plan, and includes resubdivision; ....

I really appreciate this opportunity to advise you of my concerns. I would be happy to discuss these issues with you or anyone else at any time. I can provide any additional information you seek. I hope you can help me to get the statutes changed.

Sincerely,

Charles Rinaldi
Enfield
December 12, 2013

Via email - governor.regulations@ct.gov; Commissioner Rubenstein, Department of Consumer Protection

Dear Sir/Madam,

In response to Governor Daniel Malloy’s October 16, 2013, Executive Order No. 37 that invites public comment on ineffective regulations over four years old, we submit our suggestions with respect to such regulations pertaining to alcohol beverages under the jurisdiction of the Department of Consumer Protection (“Department”).

The Problem

At present, there is considerable confusion among members of all three tiers of the alcohol beverage industry regarding what is, and is not permitted. At Diageo, we believe it is imperative that the regulatory structure give clear direction in various trade practice matters.

Guiding Principle for Regulatory Reform

We also believe that a proper regulatory structure should consider real world business practices and establish realistic limits regarding permissible ways for industry members to promote alcohol beverages.

Historical Regulatory Context

When Prohibition ended, the federal government passed the Federal Alcohol Administration Act (“FAA Act”) to address the excesses that led to the ban on the sale and distribution of alcohol in the U.S. As implemented, the FAA Act offers clear guidance to industry members designed to avoid practices that led to suppliers’ domination of retailers and the promotion of excessive consumption of alcohol. Of course, the FAA Act has evolved over the years in recognition of changes in society and the industry. With regard to the “tied house” laws, there has been a general acknowledgment that with the increasing size and influence of wholesalers and retailers in the industry, there is less need for regulatory protection of such entities from the once predatory trade practices exhibited by suppliers in previous eras.

While state policymakers appropriately retain general authority over alcohol beverage policy, the FAA Act provides state alcohol beverage control authorities with general guidance concerning the regulation of alcohol beverage trade practices and marketing. In fact, a number
of states (e.g., Hawaii and New Mexico) have adopted the FAA Act as part of their alcohol beverage laws and regulations to govern trade practices, marketing and advertising. Other states have used the FAA Act as a starting point for developing their own regulatory framework concerning alcohol. These individual state actions have resulted in varying degrees of control. Similar to the FAA Act, the best state alcohol beverage laws and regulations provide for clear and reasonable exceptions to broad-based prohibitions against unlawful inducements, i.e., providing something of value to retail licensees that unduly influence the purchasing decisions of retailers.

As is the case with the FAA Act, many states have updated, reinterpreted or completely re-written their laws, regulations and policies concerning alcohol regulation over the years. We view these efforts to update and revise alcohol beverage laws and regulations as positive developments. Policymakers are acknowledging that “the law” is not static, but must evolve to preserve the three-tier system while taking into account that society, the retail environment, and consumers’ demands have changed significantly since the mid-1930s.

**Specific Regulatory Requests: On-premise sampling, retailer entertainment, elimination of burdensome requirements**

*On-premise sampling*

In recent weeks the Department has clarified its position with regard to off-premise sampling along with supplier and/or wholesaler participation in such activities. We were pleased with this clarification and have subsequently urged the Department to extend this position to on-premise sampling. At present, there is no regulatory language permitting or prohibiting on-premise consumer sampling. We believe that in Connecticut, both on- and off-premise sampling should be treated and enforced equally, and that suppliers and wholesalers should be able to responsibly promote their brand products and educate consumers through these activities.

It is important to understand why industry members seek opportunities to engage in off-premise and on-premise consumer samplings. Innovation is the life blood of growth in the alcohol beverage industry, in particular within the spirits category. Consumer sampling is critical to the introduction of new products by allowing consumers to learn about and try product innovations. When suppliers and/or wholesalers conduct sampling activities the focus is on interacting and engaging with consumers to promote awareness of suppliers’ products. The involvement of suppliers, their agencies, or their wholesalers is essential to effectively sample, as their trained personnel have the requisite knowledge concerning the attributes of these new products. Any services provided by suppliers or wholesalers in connection with sampling promotions are not intended to provide something of value to retailers or to unlawfully induce future sales, but simply to facilitate a meaningful consumer experience of the product being sampled.
It is also important to note that most states allow both on- and off-premise sampling. In fact, according to our state by state summary of sampling permissibility, 40 states allow some form of off-premise sampling and 45 states allow some form of on-premise sampling.

*Retailer Entertainment*

Diageo believes that limited retailer entertainment activity to facilitate relationship building between suppliers and retailers, and between wholesalers and retailers, is an appropriate and acceptable business practice in the alcohol beverage industry. Retailer entertainment activities can range from sharing a cup of coffee or a meal with a retailer employee or, in limited circumstances and with Diageo employees in attendance, going to a ball game, golf outing or concert. In addition, retailer entertainment can mean a private event for the trade where only retailers are invited and education and sales training are provided on designated Diageo products. In fact, the Department has recently approved this latter type of retailer entertainment in Connecticut. Without clearly marked boundaries, regulations are inconsistently followed and subject to misinterpretation by all parties. Therefore, we urge the Department to issue regulatory language clarifying the permissibility of retailer entertainment.

To justify this position, we first note that the FAA Act does not prohibit retailer entertainment and, similarly, no state to our knowledge expressly prohibits it. In fact, though the laws and regulations of most states are silent on the issue, there are 15 states whose laws expressly permit some form of retailer entertainment. The alcohol beverage law in Texas, for instance, permits suppliers to provide entertainment to retailers up to $500 per retailer employee, per single occasion. Under Illinois’s Trade Practice Policies, suppliers and/or wholesalers may provide retail licensees or their employees with normal and customary hospitality, i.e., lunch, dinner, and tickets to sporting events provided they are accompanied by a representative of the supplier or wholesaler.

Further, while it does not have jurisdiction as an alcohol beverage regulatory agency, the Internal Revenue Service has specific business guidelines concerning retailer entertainment. When engaging in reasonable entertainment of retailers, Diageo follows IRS regulations, state laws, and our global company policies governing gifts and entertainment.

*Elimination of burdensome and unnecessary regulations that have little rationale for existing*

It is our belief that if the rules are clear, there is no need to require pre-notification or reporting of impending activities. Diageo promotes compliance from the highest levels, and it is in our best interest to follow relevant laws. We urge the Department to review its regulations with this understanding in mind and eliminate unnecessary requirements that burden both industry members and staff at the Department. One specific pre-notification requirement should be eliminated is the requirement to provide the Department with notice before donating alcohol beverage products to non-profit entities. Instead, we suggest that the Department offer language permitting charitable donations of alcohol beverages and money, and, if desired, require that suppliers, wholesalers or retailers retain records of such giving.
An additional burdensome and unnecessary reporting requirement is the regulation that requires giving the Department prior notice of promotional funds granted by suppliers to wholesalers for marketing activities. Under Sec. 30-6-A29 of the Department’s regulations, out-of-state shippers and manufacturers are required to file a report with the Department that details the promotional funds they intend to pay to wholesalers. To the best of our knowledge, alcohol beverage suppliers do not customarily file such reports and the Department does not actively monitor the activity related to such filings. Therefore, since these reporting requirements related to marketing funds serve no purpose and perpetuate unnecessary ambiguities in the law, they should be eliminated.

A related requirement under Sec. 30-6-A29 is that promotional funding from suppliers to wholesalers must be provided on a non-discriminatory basis, and apportioned on the basis of the population in wholesalers’ authorized territories. Though on its face basing the allocation of promotional support on population appears to achieve the goal of avoiding discrimination, population as the basis of apportionment is unrelated to the reality of how promotional funding is most effectively distributed and inappropriate for this purpose. A better basis for allocating marketing support among wholesalers that is grounded in business reality, is one based upon the level of sales of suppliers’ products which affords businesses with the freedom to adapt to changing needs over time.

**In Summary**

To conclude, we urge the Department to communicate clear guidance to industry members expressly permitting: (1) on-premise consumer sampling including the opportunity for suppliers, their agency representatives, or wholesalers to pour their products, similar to what is already permitted under the existing interpretation of off-premise regulations; and (2) reasonable retailer entertainment. Furthermore, we urge a review of the current regulatory language to focus on clarifying the regulations and making them consistent with modern business realities by removing unnecessary notice and reporting requirements.

Thank you for your consideration. We look forward to working with the Administration, the Department and members of the legislature to accomplish the goal of providing a clearer and updated regulatory structure for the alcohol beverage industry.

Respectfully,

Dwayne A. Kratt
**Duplicative Regulations:**

Recommend the following Public Health Code Regulations be repealed and CT adopts the FDA Food Code. The Food Code is a national document already adopted by many states, both large (California) and small in population (RI).


3. 19-13-B42 Sanitation of Places Dispensing Food or Beverage (Rev 7/3/07)


5. 19-13-B48: Itinerant Food Vending and Catering (effective date 10/5/2005)


DPH has recently reinstated the Food Advisory Committee due to the many issues with the multiple regulations. Adoption of the FDA Food Code creates less of a burden for industry by adopted the nationally recognized document, and will eliminate the duplicative efforts created by Food Protection Regulations. The FDA Food Code has a train-the-trainer element and is reviewed bi-annually. The Food Code is a national guidance document governing food safety and has been an effective tool for over 30 years, yet CT will not accept and embrace uniform inspections process based on the most current science governing food safety.

Respectfully,

Eloise Hazelwood, RS, MPH
Director of Health
Town of Wallingford, CT 06492
December 13, 2013

The Honorable Dannel Malloy
Office of the Governor
State Capitol
210 Capitol Avenue
Hartford, CT 06106

Dear Governor Malloy:

The Connecticut Hospital Association (CHA) respectfully submits the following list for consideration in response to the Governor’s Executive Order No. 37, through which the Governor asks for input on regulations that may be in need of review and revision as either “outmoded, unnecessarily burdensome, insufficient, or ineffective.”

The Department of Public Health (DPH) has oversight for all of the regulation sections identified below.

A. Specific changes are needed to Section 19-13-D3 and 19-13-D4a:

   1. 19-13-D3(d)(8), the informed consent section, should be better aligned with more recent federal requirements.

   2. 19-13-D3 (l)(3), the infection control section, should be better aligned with federal requirements, including that infection control program meetings should be held as needed, and are not required “monthly,” which is unnecessarily burdensome.

   3. 19-13-D4a, the regulation for children’s hospitals, is outdated and should be more consistent with the more recently updated requirements of 19-13-D3, where applicable.

B. The following outdated medical records provisions should be revised:

   1. 19-13-D4a(d)(4); 19-13-D5(d)(4); 19a-59-1(c): The record retention period should be changed to ten years.

   2. 19-13-D5(d)(5): The timeframe for completion of medical records should be changed to thirty days after discharge of the patient.
C. The following regulations should be reviewed to ensure that they align with other state laws and federal laws. Issues we identified include:

1. 19a-279-1 through 19a-279-15, inclusive. **Issue:** Whether these are necessary in light of the federal rules for organ procurement. **Requested action:** Repeal or align with federal requirements.

2. 19a-504c-1. **Issue:** Whether a patient should be required to sign his/her discharge plan now that discharge plans are more fluid and often updated per federal requirements. **Requested action:** Repeal or align with federal requirements.

3. 19a-36-A1 through 19a-36-A56, inclusive. **Issue:** Whether these sections are outdated, evidence-based, and/or fail to properly reflect reliance on modernized data collection systems. **Requested action:** Review for, and delete, outdated provisions; modernize the data collection process.

4. 19a-36-D1 through 19a-36-D38, inclusive. **Issue:** Whether these sections are outdated, evidence-based, and/or conflict with or duplicate federal rules and requirements for oversight. Additionally, federal CLIA rules are being updated to allow more flexibility in patient and provider access to lab results. Connecticut’s access rules will need to be aligned with those federal changes. **Requested action:** Align with federal provisions to remove unnecessary duplication and clarify access rights and processes.

D. The following regulations, in whole or in part, contain outdated language, incorrect or outdated citations, or fail to align with other sections of law or the Public Health Code. Some of the sections cite statutes that were repealed or transferred several decades ago, which can make the regulations very difficult to understand. We believe all of the sections listed below should be updated, unnecessary sections deleted, and the citations and references modernized to provide accurate information on enabling and controlling statutes.

Sections 19-13-D1; 19-13-D1a; 19-13-D2; 19-13-D14; 19-13-D44; 19-13-55a; 19-13-56; 19a-127n-1 and 19a-127n-2; 19a-490k-2; 19-13-D14; 19a-586-1 through 19a-586-3; inclusive; 19a-643-1 through 19a-643-206, inclusive; 19a-7h-1 through 19a-7h-4, inclusive; 19a-177-1 through 19a-177-9, inclusive; 19a-179-1 through 19a-179-21, inclusive; 19a-180-1 through 19a-180-10, inclusive; and 20-10-1 through 20-10-6, inclusive.

Sincerely,

[Signature]

James D. Iacobellis
Senior Vice President, Government and Regulatory Affairs

JDII:js
By E-mail
December 14, 2013

The Honorable Dannel P. Malloy
Office of the Governor
State Capitol
210 Capitol Avenue
Hartford, CT 06106

COMMENTS REGARDING: Section 19-13-D5, Regulations of Connecticut State Agencies (Chronic Disease Hospitals)

AGENCY JURISDICTION: Department of Public Health

Attached please find suggested revisions to certain provisions in Section 19-13-D5 of the State of Connecticut Public Health Code. We are submitting proposed revisions to update the section governing Chronic Disease Hospitals, which was last revised on December 1, 1977. To a great extent, the proposed revisions mirror updated language in Section 19-13-D3 of the Public Health Code for acute care hospitals, published in 2008.

The health care industry has evolved considerably over recent years. We appreciate this opportunity to bring current the health regulations applicable to chronic disease hospitals as part of the state-wide initiative to increase transparency and promote efficiency. Improvements to the regulatory environment will enable us to further pursue our distinct mission to serve the chronically ill, medically complex patients of our state, including those with accompanying severe disabilities. The ability to streamline our internal operations and organizational structures will allow the hospital to better utilize its human and financial resources.

- Medical Records: The most significant revision in section 19-13-D5(d)(4) would shorten the required retention period for medical records to ten (10) years, consistent with current industry standards as well as the recently revised state regulations for acute care hospitals. This measure alone would alleviate an unnecessary financial burden on chronic disease hospitals in Connecticut. We are also recommending that the timeframe in which medical records must be completed be lengthened from fourteen (14) to thirty (30) days, which is appropriate given our patients often experience medically-complex conditions and a longer length of stay, requiring extensive documentation.

The proposed revisions also update the requirements for documentation of initial history and physical exams (H&Ps) to be consistent with federal Medicare Conditions of Participation.
• Administration and Medical Staff Organization: The suggested revisions remove obsolete provisions and update terminology related to hospital administration and organization of the Medical Staff. The proposed revisions include allowing for biennial (rather than annual) appointment of the Medical Staff, in accordance with current accreditation requirements\(^1\), industry practice and recommendations of the Medicare Conditions of Participation for periodic reappraisal of individual practitioners\(^2\).

• Licensure Inspections: A new provision is added related to the scope of routine and additional licensure inspections and handling of criminal evidence, identical to the new language added to Section 19-13-D3 for acute care hospitals.

• Certain other technical revisions are proposed to streamline and update various portions of Section 19-13-D5.

Please contact me at (860) 832-6212 or coopere@hfsc.org with any questions.

Respectfully submitted,

\[\text{Beth Cooper, J.D.}
\text{Regulatory Counsel}\]

Attachment

\(^{1}\) The Joint Commission, Standard MS.07.01.01, EP 3
\(^{2}\) 42 CFR §482.22(a)(1)
Sec. 19-13-D5. Long-term hospitals: Chronic disease hospital

Proposed revisions to paragraphs (a), (b), (c), (d), (g), (h) and (i):

(a) Physical plant.

(1) The hospital buildings shall be of sound construction and shall provide adequate space and equipment for patient accommodations and for service and other areas, in accordance with the requirements of the state Department of Public Health. Properly equipped diagnostic and therapeutic facilities shall be provided.

(2) The hospital buildings and equipment shall meet the requirements of the state fire safety code pursuant to 29-40 and seq. section 29-292 of the Connecticut General Statutes. Annually, the licensee shall submit an application for a license which shall be accompanied by a current certificate of inspection by the local fire marshal to the Department of Public Health.

(3) Areas in which explosive gases are used, and areas in which radioactive materials are used, shall meet the requirements of the state department of health for adequate protection of patients and personnel.

(4) The hospital buildings and equipment shall be maintained in a good state of repair and shall be kept clean at all times.

(b) Administration.

(1) The hospital shall be managed by a governing board whose duties shall include, as a minimum:

(A) Adoption of bylaws, rules and regulations, including medical staff bylaws;

(B) annual or biennial appointment of the medical staff;

(C) appointment of a competent hospital administrator;

(D) establishment of a joint conference committee composed of an equal number of representatives of the governing board and of the medical staff, and the administrator of the hospital.

(2) The administrator shall be responsible to the governing board for the management and operation of the hospital and for the employment of personnel. He shall attend meetings of the governing board and meetings of the medical staff, and shall be a member of the joint conference committee.

(3) Personnel shall be employed in sufficient numbers and of adequate qualifications that the functions of the hospital may be performed efficiently.

(c) Medical staff.

(1) There shall be an organized medical staff of not fewer than five physicians, one of whom shall serve as a chief or president of the medical staff.
(2) The medical staff shall adopt written rules and regulations governing its own activities, subject to approval by the governing board of the hospital. As a minimum, these shall include:
(A) method of control of privileges granted to members of the medical staff;
(B) method of control of clinical work;
(C) provision for regular staff conferences;
(D) regulations for preparation of medical records appointment of a medical executive committee, or its equivalent, and other committees as appropriate;
(E) appointment of committees, to include medical record committee (or medical audit committee), representatives to joint conference committee and others as necessary; (F) procedure for recommending appointments to the medical staff and for hearing complaints regarding the conduct of members and referring the same, with recommendations, to the governing board.

(3) Medical staff conferences shall be held once each monthquarter, either as general medical staff meetings or through departments, or more frequently. If all clinical groups hold departmental conferences at least monthly, general staff conferences may be less frequent, but there shall be a minimum of four each year. Conferences shall be planned to implement improved service to patients and shall be devoted primarily to thorough review and analysis of clinical work and discussion of interesting cases. All meetings shall be attended by at least seventy-five percent of the active staff members. Minutes and a record of attendance shall be kept for each such meeting.

(d) Medical records.

(1) There shall be a medical record department with adequate space, equipment and qualified personnel, to include at least one registered records manager or director with sufficient librarian or a person with equivalent training and experience to oversee the medical records department, in a hospital of one hundred beds or over.

(2) A medical record shall be started for each patient at the time of admission with complete identification data and a nurse’s or other licensed practitioner’s notation of condition on admission. Upon admission, To this shall be added immediately an admission note and orders by the attending or admitting a resident physician shall be added to the medical record. The medical record of every patient shall contain a complete history and physical examination which, except in emergencies, shall have been completed nor more than seven (7) days prior to admission or within forty-eight (48) hours after admission. This requirement is satisfied if a history and physical examination was performed within thirty days prior to the admission and updated no more than seven days prior to, or within 48 hours after, the admission be recorded by the physician within twenty-four hours of admission and The recording of the history and physical examination shall be, except in emergencies, placed in the record always before prior to any surgery and within the timeframe set forth in the hospital’s policies in all other cases, except in cases of unusual emergency.

(3) All medical records shall include proper identification data. The clinical records shall be prepared accurately and completed promptly by physicians and shall include sufficient
information including progress notes to justify the diagnosis and warrant the treatment. All
Doctors’ orders, nurses’ notes and charts shall be kept current in an acceptable manner; all
entries shall be signed or initialed by the person responsible for them, making the entry. The
medical records created or maintained by a chronic disease hospital do not have to comply with
the requirements of section 19a-14-40 to 191-14-44, inclusive, of the Regulations of Connecticut
State Agencies.

(4) Medical records shall be filed in an accessible manner in the hospital and shall be kept
for a minimum of twenty-five years after discharge of patients, except that original medical
records may be destroyed sooner if they are preserved by a process consistent with current
hospital industry standards, microfilmed by a process approved by the state department of health.
If paper records are destroyed sooner, the hospital shall provide the Department of Public Health
with a list of the process or processes it uses.

(5) Medical records shall be completed within fourteen thirty days after discharge of the
patient except in unusual circumstances which shall be specified in the medical staff rules and
regulations. In all cases, the discharge summary shall be completed and shall accompany patients
at the time of discharge to another health care facility. Persistent failure by a physician to
maintain proper records of his patients, promptly prepared and completed, shall constitute
grounds for suspending or withdrawing his medical staff privileges.

(g) Pharmacy:

(1) There shall be a competent pharmacist, registered in Connecticut, who shall be responsible to
the administrator for all pharmaceutical services in the hospital. In chronic disease and
rehabilitation hospitals with more than one hundred beds, he shall serve on a full-time basis.

(2) The hospital pharmacy shall be operated in compliance with all applicable state and federal
drug laws and regulations.

(3) The premises shall be kept clean, adequately lighted, and ventilated and the equipment and
facilities necessary for compounding, dispensing, manufacturing, producing or processing of
drugs shall be maintained in good order.

(4) Drugs used in the hospital shall meet standards established by the United States
Pharmacopeia, The National Formulary or the Federal Food and Drug Administration and shall
be stored and kept so as to insure their proper purity and strength. A medical staff pharmacy
committee in conference with the pharmacist shall formulate policies to control the
administration of toxic or dangerous drugs with specific reference to the duration of the order
and dosage.

(h) Dietary service.

(1) Adequate space, equipment and qualified personnel shall be provided to ensure proper
selection, storage, preparation and serving of regular and special diets to patients at regularly
scheduled hours.
(2) Menus shall be prepared and posted and shall meet state department of health requirements for basic nutritional needs.

(3) Methods of dishwashing and sanitizing, food handling and garbage disposal shall comply with the requirements of the state Department of Public Health.

(i) General.

(1) The hospital shall have an adequate laundry service. This may be provided within the hospital or purchased outside the hospital.

(2) Adequate housekeeping and maintenance services shall be provided.

(3) Proper heat, hot water, lighting and ventilation shall be maintained at all times.

(4) There shall be a system of communication sufficient to meet the needs of the hospital.

(5) Periodic licensure inspection shall be for the purpose of verifying that a hospital is in compliance with state requirements for licensure. The inspection focuses on, but is not limited to, the performance of the facility since the prior licensure inspection. Additional inspections shall be performed as necessary to address specific concerns or complaints relating to hospital performance or patient care. Any article which presents evidence of any crime being committed therein may be removed and delivered to the appropriate law enforcement official or the state agency having jurisdiction according to law.

(6) Other departments, professional and service, shall be provided as necessary to the size and scope of the hospital.

(67) The management, personnel, equipment, facilities, sanitation and maintenance of the hospital shall be such as reasonably to ensure the health, comfort and safety of the patients at all times.

(87) When a patient ceases to breathe and has no detectable pulse or blood pressure, the body shall be moved promptly to an otherwise unoccupied room in the same institution pending pronouncement of death by a physician-practitioner who has personally viewed the body as required in section 7-62b of the Connecticut General Statutes. The facility shall make available a room which will provide for the dignified holding of the body of the deceased person where it will not be exposed to the view of patients or visitors. The room so designated may be used for other purposes when not required for this purpose.
TO: The Honorable Dannel P. Malloy, Governor, State of Connecticut
FROM: CT Leadership Council, National Federation of Independent Business
RE: Response to Executive Order # 37
DATE: December 16, 2013

Introduction

Thank you for the opportunity to comment on regulations in Connecticut and your efforts contained in Executive Order # 37. NFIB/CT supports the initiatives contained in this Executive Order and looks forward to an ongoing regulatory reform effort in the state of Connecticut. NFIB/CT has notified and encouraged our membership to submit comments on behalf of their own small businesses, and many of them are doing so.

A non-profit, non-partisan organization founded in 1943, NFIB is Connecticut’s and the nation’s leading small-business association. In Connecticut, NFIB represents thousands of members and their employees. NFIB membership is scattered across the state and ranges from sophisticated high technology enterprises to “Main Street” small businesses to single-person “Mom & Pop” shops that operate in traditional ways. NFIB’s mission is “To promote and protect the right of its members to own, operate, and grow their businesses.”

NFIB members are entrepreneurs. Many of our members started their small businesses with an idea. They invested the necessary time, energy and resources (including personal financial investments) required to start and grow their business venture. A great deal of financial risk is involved with starting and running a business. Because of the challenges in starting and keeping a business running, it is critical that Connecticut have a “we have your back” attitude toward small businesses in Connecticut. This is particularly important since 80% of all jobs, on average, are generated from small businesses in the private sector.

In the 2012 edition of “Small Business Problems & Priorities” by the NFIB Research Foundation, “Unreasonable Government Regulations” ranked as the 5th greatest problem of concern from small business owners, up from its 6th position in 2006 and its 9th position in 2004. Much like taxes, this generic problem category costs small businesses in several ways: understanding and keeping up-to-date with compliance requirements, costs of consultants, employee time, management time, direct outlays, lost productivity and/or sales, forgone opportunities, etc. The federal government alone proposes approximately 150 new rules every year that cost business owners over $100 million per rule in compliance costs. Adding state and local laws and regulations that sometimes duplicate federal regulations, merely raise the cost and frustration level for small business. A
CONNECTICUT

comprehensive cost-benefit analysis of state agency regulations and specific attempts to minimize the regulator impact on small businesses is long overdue, and fortunately, Executive Order # 37 begins to move the ball in the right direction. Furthermore, it is NFIB/Connecticut’s sincere hope that reform doesn’t end with Executive Order #37, but that this is merely the beginning.

Beyond just reviewing both existing regulations and the manner in which regulations are promulgated, NFIB/CT also suggests an examination of how regulations are applied and enforced. Specifically, NFIB/CT feels that there is a need for a more balanced and less arbitrary approach to regulatory enforcement. In this vein, small business owners would welcome more education on behalf of the agencies related to regulatory compliance.

Regulatory Fairness Board

In addition to the many laudable goals contained in Executive Order # 37, NFIB/CT would ask for the administration’s support in considering the establishment of a small business regulatory fairness board in Connecticut. The concept of a Regulatory Fairness Board was first discussed during the breakout/workshop portion of the Governor’s Economic Summit in the fall of 2011. The concept is modeled after an existing program by the United States Small Business Administration and is quite simple: Small business owners serve on a volunteer board that deals with matters of regulatory fairness, particularly when it comes to compliance or agency enforcement matters. Most importantly, these small business owners act as the “eyes and ears” of the regulated community, and as such the Regulatory Fairness Boards can hold hearings or roundtable events to receive input from the small business community or discuss specific regulatory matters of importance. The Board also can act as a liaison between the small business community and specific agencies on regulatory matters with a goal of establishing a more reasonable, balanced and fair approach to enforcement, particularly when it comes to issues of excessive fines.

According to the United States Small Business Administration’s Office of Advocacy, “Giving small employers a voice early in the [regulatory] process is key to reducing the negative impact of regulations on small businesses, increasing the level of regulatory compliance, and passing on cost savings to state economies.” That is why the development of regulatory review boards is vital, particularly in today’s challenging economy.

Currently, several states (Hawaii, Maine, Missouri, Oklahoma, and Wisconsin, to name a few) and the federal government have regulatory review boards that, among other things, hear the concerns and issues of small businesses and advocate on their behalf in the legislative/regulatory process. Additionally, four states (Arizona, Colorado, Kentucky, and Rhode Island) have regulatory review programs with similar goals. At the federal level, a
very successful regulatory fairness board(s) is currently administered through the Office of the National Ombudsman of the U.S. Small Business Administration.

Connecticut is certainly structurally unique with a regulatory process that allows the legislature’s Regulations Review Committee to serve as a check and balance on rulemaking agencies. Additionally, the legislature has enacted some positive regulatory reform measures over the years that deal specifically with environmental or transportation matters, streamlining permitting processes, and requiring proposed regulations to contain a small business regulatory impact statement. However, with no regulatory review board or other similar program to speak of, Connecticut is at a competitive disadvantage with other states that have established such programs.

Areas Ripe for Review

Unfortunately, there is a general feeling that the needs of Connecticut’s small businesses are not being considered enough when laws, regulations and new programs are written in Connecticut. Unfortunately, new taxes, fees and costs impact small business revenue; resources they have earmarked for growth or investment in their business and to hire new staff. The fewer the taxes, assessments, and regulations, the easier it is to start and grow a business. Some special areas of concern follow. Admittedly, some of these areas may require statutory changes in addition to regulatory changes, however the administration of regulations plays a large part in the overall program(s).

Unemployment Compensation System – Department of Labor
R.C.S.A. §§ 31-222-1 – 17; 31-235-1 – 27; 31-236-1 – 58

Special Assessments to Pay for Unemployment Insurance Overages

Many small business owners feel that the State of Connecticut considers small business and businesses in general, as a source of funds for the State of Connecticut. On limited basis this is fine; however, in recent years small businesses have been considered a “cash cow” by the state. More than any single regulation, an anti-business attitude, while often unintended, hurts small businesses because the attitude affects how all policies are conceived and written. The State of Connecticut needs to think about business first not after a bill or regulation has been passed. They need to plan better and budget better so that they don’t need to assess special taxes on businesses in CT. The tax assessments are burdensome to businesses, and not budgeted for by businesses. The impact of the special assessments limits hiring in CT as they attach earnings that could be used for other purposes. Also, the State of Connecticut should not roll all businesses into one. Small
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businesses do not have the same financial resources as the big guys. They are much more financially fragile; consequently the impact of government policies on them is significantly greater.

Related to special assessments is the need to overhaul the unemployment insurance program in Connecticut. What was originally intended as a safety net has grown to a program that is out of touch with the needs of Connecticut’s employers, particular small employers. The following is a list of the issues with the program, how the program impacts small businesses and what needs to be changed to fix the program.

What is wrong with the Unemployment Insurance program?

Small businesses are having a difficult time hiring qualified people. There is very little incentive for candidates in Connecticut to apply for jobs or work if they are able to make the same money or nearly the same collecting unemployment as they can by working. The incentive to work has been impacted by current policies.

If someone is laid off and they are given 26 weeks of unemployment compensation (as in the past), the unemployed are more motivated to get out and find a job and quickly because their unemployment benefits are limited. The prior program motivated the worker and it limited the expense for the State of Connecticut and businesses. However, during the recession, the benefit period was extended to 99 weeks. The extension has placed a huge financial burden on businesses as the costs go on and on without relief, particularly those who have had to lay off staff. The taxes impact the ability for businesses to hire again. The longer they pay the taxes, the longer it takes them to hire, and the problem remains cyclical. It is obviously very difficult to pay the taxes and hire new people.

The unintended consequence of the current program is that many qualified workers don’t want to work. They want to stay home and collect their benefits until the benefits are closer to running out. The other negative consequence to this is many qualified workers become unqualified as their skills are not being maintained, and potential employers are concerned by their long absence from the workforce. Sadly, the result is that many unemployed workers have become permanently unemployable; particularly those in their late 50’s and 60’s. Many of the long-term employed may have also had to obtain other state benefits, which could have been avoided if the program were shortened. This is not good for Connecticut or the unemployed.

Solution

Encourage laid off workers to go back to work by limiting the benefits to 26 weeks or thereabouts. Encourage them to take part-time work to extend their unemployment
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benefits. At present, the unemployed are discouraged to work part-time as it lowers the amount of their benefits. Strengthen the requirements, oversight and verification of work search by those who are unemployed.

Working part-time would keep workers in the work force and lead to full-time work, not create a population of permanently unemployed workers. It would also motivate candidates to apply for part-time or entry level jobs, as it would not impact their unemployment rate. This would benefit the unemployed and businesses. However, it is critical to require proof that the unemployed are looking for work and require that they work part-time or volunteer to keep engaged in the community while they are seeking employment.

If an employee is fired for theft or failing to follow their employment agreement, etc. they should not be offered unemployment. There needs to be personal responsibility when workers accept positions. We shouldn’t incentivize bad job performance. When this occurs, businesses pay taxes for workers that did not perform as expected. This isn’t “having the back” of the small business and doesn’t teach personal responsibility. Remember, businesses don’t want to fire workers. It costs them money. When an employee is let go, overwhelmingly, it is for good reason.

Other Unemployment Compensation Issues
R.C.S.A. §§ 31-222-6 – 7
This section has been rendered obsolete as a result of P.A. 13-288 and should therefore be modified as appropriate.

Other Issues

Some other issues impacting small businesses include:

Licensing - This generic problem applies across many state agencies. License fees are simply a tax by another name. The frequency of the paperwork requirements is another time and compliance burden. One suggestion is to extend out licensing renewals to longer time periods. Extensions will reduce paperwork and costs for small businesses and administrative work by the State of Connecticut. Terms could be 5 or 10 years as opposed to annually or semi-annually.

Property Tax Filings - Tax filings should be based on the most recent year’s federal tax filing to align depreciation schedules and reporting requirements. Most small businesses operate on a calendar year so this would save considerable time, effort and accounting fees. For example instead of filing 9/30/13 and again at year-end, it could be done on 12/31/13.
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**Duplicate and overlapping requirements by state and federal agencies** – There are many areas where state and federal oversight(s) and requirements are duplicate and thus, not only burdensome, but unnecessary. For administrative and compliance ease, Connecticut should undertake a review of areas where it may make sense for the state to simply defer to the federal oversight/requirements rather than duplicate a program/requirement. For example, why are there separate drug registrations for both the State of Connecticut (Department of Public Health) and the federal government (Drug Enforcement Administration)? Why not just simply identify narcotics prescribers by their federal licenses and skip state registrations?

“Householding” of state fees for small businesses – The state should look toward providing small business owners the ability to fill out one form, and write one single check (or EFT), to pay each and every fee that may be required of them on an annual basis. For example, the business entity tax, license renewal fees, etc., could all be paid at one through one check or EFT by a small business. This prevents small business owners from having to make multiple payments to multiple state agencies at multiple times and keep track of multiple pieces of paperwork.
WATER COMPANY LAND PERMIT APPLICATION

This application must be submitted when a water company intends to sell, lease, transfer or assign Class I or II water company land or intends to change the use of Class I or II water company land per Connecticut General Statutes (CGS) Section 25-32. The following information should be supplied by the current administrative official of the water company. Refer to the Regulations of Connecticut State Agencies (RCSA) Sec. 25-37d-1 through 9 for information on the water company land application review process. Electronic submission of applications and attachments is permissible, provided that the applications include signatures.

**Section A. Public Water System and Applicant Information**

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Rev. 6/16/10
Section B. Basis for Requesting Approval or Permit (select all that apply)

- Formal Enforcement Action (Administrative Order, Consent Order, Notice of Violation (Civil Penalty))
- Violation Identified in Sanitary Survey Report
- Project Identified in Approved Water Supply Plan
- Federal or State Grants or Loans  □ DWSRF  □ STEAP Funds  □ STAG Funds
- Proactive (system improvements or enhancements)
- Other: ____________________________

Section C. Type of Approval or Permit Requested (select all that apply)

- Water Company Land Sale, Lease, Transfer or Assignment (Complete Sections D, E and G)
  Check one of the following:  Sale  □  Lease  □  Transfer  □  Assignment  □
- Water Company Owned Lands Change in Use (Complete Sections D, F and G)

Section D. Project Description

Provide a general summary of the proposed project, including the total acreage of each class of water company land to be disturbed or the total acreage of each class of water company land which will be subject to the sale, lease, transfer or assignment or change in use. Refer to CGS Sec. 25-37c for land classification definitions. You may attach additional sheets, if necessary.

__________________________________________________________________________
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Section E. Supporting Information- Sale, Lease, Transfer or Assignment

Each of the following items should be labeled with the section and number (i.e. Section E – #4). If the item is not applicable, provide the number and indicate “N/A”.

1. Provide a scaled site plan that shows all water company land to be sold, leased, transferred or assigned.
2. Indicate the proposed methods of protective restrictions and enforcement the applicant or other parties will impose on the parcel to be subject to the permit. (If restrictions do not apply uniformly throughout a parcel, attach a map that shows the restrictions that apply to each portion of the parcel.)
3. Provide a draft copy of the sale, lease, transfer or assignment agreement.
4. Provide copies of the notification letter sent to the chief elected and chief executive officials of the towns in which the proposed sale, lease, transfer or assignment will occur. Submit both sides of the certified mail green return receipt or United States Postal Service delivery confirmation.
5. Provide a copy of the “Capacity Evaluation for Water Company Purchase”, completed by the entity to which the land will be sold, leased, transferred or assigned.
6. Provide copies of any deed restrictions or variances.
7. If the applicant is required to prepare a water supply plan pursuant to CGS Section 25-32d, indicate whether the proposed sale, lease, transfer or assignment is consistent with the current approved plan.
8. Provide the sale of a source notification letter required by CGS Section 25-33l and any subsequent correspondence, if applicable.
9. For the lease of Class I water company land associated with groundwater sources, provide copies of the sanitary easements indicating restrictions within the affected sanitary radius.
### Section F. Supporting Information- Change in Use

Each of the following items should be labeled with the section and number (i.e. Section F – #4). If the item is not applicable, provide the number and indicate “N/A”.

1. Provide a final scaled project site plan including existing conditions, horizontal and vertical extent of site disturbance including access and permanent and temporary land disturbance. Describe the nature and necessity of the impervious materials used at the site (i.e. pavement). Include any evaluation conducted to determine the impact of the impervious area on the recharge of the water supply sources.

2. Provide copies of the notification letter sent to the chief elected and chief executive officials of the towns in which the proposed project is located. Submit both sides of the certified mail green return receipt or United States Postal Service delivery confirmation.

3. Provide a brief outline of the project (i.e. site preparation, demolition, construction, stabilization); include a spill prevention and emergency response plan or drinking water quality management plan.

4. Indicate the proposed methods of protective restrictions and enforcement that the applicant or other parties will impose on the parcel to be subject to permit, and demonstrate that such change will not have a significant adverse impact upon the present and future purity and adequacy of the public drinking water supply. (If restrictions do not apply uniformly throughout parcel, attach a map which shows the restrictions which apply to each portion of the parcel.)

5. Indicate alternatives that were considered and why this option was chosen.

6. Describe the benefit to the water system as a result of the proposed change to the water company land.

7. Provide copies of any deed restrictions, variances or permits required by other regulatory agencies.

8. Provide a copy of the Revocable License Agreement, if applicable.

9. If any part of the sanitary radius of a groundwater source wellhead is owned by another entity, provide copies of the sanitary easements, if applicable.

10. If the applicant is required to prepare a water supply plan pursuant to CGS Section 25-32d, indicate whether the proposed change in use is consistent with the most current approved plan.

11. Describe the short and long term land improvements designed to protect the water source(s), such as primary or secondary stormwater treatment, addition of native vegetative buffers or other low impact development management practices.

### Section G. Certification Statement

I certify to the best of my knowledge that the information provided in this application is complete and correct. I understand that the information I provide will be used by the Department of Public Health, Drinking Water Section to determine if a Permit for the Sale, Lease, Transfer or Assignment or Change in Use of Water Company Land can be granted.

____________________________________________________  __________________________
Signature of PWS Administrative Official                      Date

____________________________________________________  __________________________
Name of PWS Administrative Official (print or type)                      Title
To: Office of Governor Dannel P. Malloy

From: Betsy Gara
   Executive Director, COST

Date: December 16, 2013

Re: Executive Order No. 37 - Outdated, Unnecessarily Burdensome, Inefficient or Ineffective Regulations

Thank you for the opportunity to assist your office in identifying regulations and policies which are outdated, unnecessarily burdensome, inefficient or ineffective. The Connecticut Council of Small Towns (COST) applauds your continued efforts to improve the efficiency of state government.

Comptroller’s Office

Resident State Trooper Program

Municipalities recently received notice that the state was increasing the fringe benefit rate associated with overtime paid to resident state troopers. Unfortunately, towns were not informed of this change in policy until after their local budgets were adopted and these amounts were not budgeted. Notice of changes in the fringe benefit rate after local budgets have already been adopted is an ongoing issue.

Moreover, there continue to be questions regarding how the fringe benefit rate is calculated. It is our understanding that the new fringe benefit rate includes an increase to cover the costs of pensions for the entire state police department, which unfairly penalizes Connecticut’s small towns.

The resident state trooper program has been in place for over 60 years. Over the years, more and more small towns have chosen to utilize resident state troopers to provide greater public safety protection to their citizens. In fact, of the state’s 1,200 troopers, 117 are resident troopers assigned to specific towns. Although the cost to communities has gone up to 70 percent, it has still been viewed as the best way for small communities to have a strong law enforcement presence.

COST urges that concerns regarding the fringe benefit rate be addressed to ensure that communities can appropriately budget and afford continued participation in this program.
Municipal Employees Retirement System
Pension and benefit costs are increasingly driving up municipal budgets. For municipalities participating in the Municipal Employees Retirement System (MERS), this is due to inequities in how the system is funded. According to the Office of Legislative Research, the employee contribution rate has not changed since MERS was established in 1947.

State law caps the municipal employee contribution rate at 2 ¼% of earnings subject to Social Security taxes or 5% of earnings not subject to Social Security taxes. In the past 12 years, however, the employer contribution rate has been increased 12 times.

As a result, from FY 02 – FY 12, for employees covered by social security, the employer share for regular employees has increased from 37% to 70% and from 35% to 75% for hazardous duty employees. For employees not covered by social security, the employer share for regular employees has increased from 55% to 84% and from 63% to 88% for hazardous duty employees for the same time period.

This imbalance in funding the Municipal Employees Retirement System is straining the budgets of municipalities, forcing reductions in critical services or increases in property taxes.

COST supports efforts to increase the employee contribution by 1% annually over the next three years for a total increase of 5.25%. This is a modest proposal which will more equitably fund the system and ensure its continued financial viability.

Connecticut Siting Council
Annual Municipal Reports – Section 7-163b, CGS
Current law requires annual municipal reports to be filed with the Connecticut Siting Council. COST recommends that this provision be repealed. The report requires municipalities to report on the location, type and height of each existing telecommunications tower and each existing and proposed antenna subject to local jurisdiction. Municipalities generally don’t have this information readily available and the Council refers towns to its database for the information. Inasmuch as the Council already has this information and is the permitting authority of record, the annual reporting requirement is unnecessary.

State Department of Education
Minimum Budget Requirement
The state enacted the Minimum Budget Requirement (MBR) and, formerly, the Minimum Expenditure Requirement (MER) to ensure that towns appropriate the statutorily set foundation level for each student. In addition to supporting legislation to provide towns with greater flexibility to reduce costs under the MBR, COST recommends that concerns be addressed regarding the administration of the MBR, specifically, the waiver process.

Under the current process, the state Department of Education may provide waivers from the MBR under certain circumstances. However, if towns are successful in achieving savings from negotiating health insurance contracts or sharing services with other communities, it is our
understanding that SDE will not authorize a waiver. Instead, it will determine whether the town is subject to forfeiture penalties. The State Board of Education may provide a waiver from the forfeiture penalties for good cause, however, putting towns in the position of having to gamble whether they will be penalized for achieving cost savings. In view of efforts to promote cost savings on the municipal level, these provisions should be revised to authorize the SDE to issue a waiver if a town can demonstrate that it has achieved costs savings without undermining educational programs.

**Department of Emergency Services & Public Protection (DESPP)**

**Public Safety Answering Points – Consolidation**
COST recognizes that consolidation will help reduce costs. However, concerns have arisen regarding how consolidation may impact public safety in our communities. DESPP should utilize a process in which towns are partners in a state-facilitated process – rather than state-mandated process - to encourage PSAPs to regionalize. COST continues to support an incentive-based approach to encourage the consolidation of Public Safety Answering Points where appropriate and involve municipalities in decisions regarding consolidation.

**Trooper Barracks - Consolidation**
DESPP is undertaking the consolidation of trooper barracks in an effort to reduce state costs. Concerns have arisen regarding how this may impact public safety in our communities. Again, we believe that many of these issues could be addressed by involving municipal officials as partners in discussions about how to achieve consolidation without jeopardizing public safety in our communities.

**Issuance of Firearm Permits**
Under current law, chiefs of police or wardens are authorized to issue firearm permits. However, many smaller communities do not have organized police departments. We therefore recommend that this provision be revised to authorize the chief elected officials of the municipality to designate a state trooper as the issuing authority for firearm permits.

**Department of Labor**

**Prevailing Wage**
COST has long supported increases to the prevailing wage thresholds, which are statutorily set. There other issues relative to the regulation of prevailing wage laws that may be addressed administratively.

Recently, some towns have been advised by legal counsel that they cannot accept donated labor because it would violate the state’s prevailing wage requirements. Small towns and cities often rely on volunteers to provide services that benefit the community. COST supports efforts to clarify that municipalities are permitted to use qualified (duly licensed) volunteers who are willing to donate labor on projects subject to prevailing wage laws.

In addition, the state should explore ways of more accurately determining wage rates. Under the current process, the state adopts wages as determined by the federal Department of Labor. While this may be a cost-effective approach, it results in some disparities. For example, why are the
labor rates for performing work on a multimillion dollar facility the same as the wage rates for
renovating or constructing a salt shed or locker room? The current process for determining
building wage rates disproportionately increases the costs of relatively small projects.

Department of Public Health

Emergency Medical Services – Primary Service Areas
COST supports efforts to overhaul the process for 1) designating and changing primary service
areas and 2) by which municipalities can petition to change or remove a primary service area responder. Although a task force has been convened to develop recommendations to address this
issue, given the importance of this issue to the safety and health of town residents, we believe it
addressing this should be an administrative priority.

Non-Transient Community Water Systems – Approval Process
The process for obtaining approval for non-transient community water systems, e.g. convenience
stores, coffee shops, is very time-consuming, undermining local economic development
initiatives. While we understand that staff and resources at the department are limited, the delays
in processing these applications must be addressed.

Change of Use Permits – Section 25-32, CGS; Section 25-37d-1, RCSA
COST supports narrowing the definition of activities that warrant a “Change of Use” permit from
the state Department of Public Health to exclude activities that are performed to maintain or
upgrade municipal water systems. Under the current process, DPH requires a change of use
permit for anything that constitutes “one shovel of dirt”. This captures a wide range of routine
activities that require municipal water staff to submit a permit application and accompanying
information, see attached, to DPH and wait for approval to perform certain maintenance tasks.
In addition to unnecessarily tying up the resources of municipal staff, this requirement also
delays projects that need to be completed under certain weather conditions or during certain
times of the year.

Reimbursement Formula for Potable Water Systems – Section 22a-471-1, RCSA
COST recommends revisions to Section 22a-471-1, RCSA, to update the formula for allocating
funding to assist communities with areas served by contaminated wells. Under the existing
formula for reimbursing municipalities that must install water systems to provide potable water
to residents, reimbursement is limited to smaller-sized pipes to meet the short-term needs of the
resident. This is an inefficient reimbursement method because if reimbursement could be used to
install pipes sized to provide sufficient water capacity to these areas, residents would have a
long-term solution to water supplies need for public health and fire protection. For example, this
is currently an issue in the Town of Durham, which is struggling to address contamination issues
resulting from a superfund site.

Water Quality and Treatment Projects – Sec. 25-33a, CGS; Section 25-33b-1-5, RCSA;
Section 16-1.59b, RCSA
These provisions were enacted by the state to implement the Safe Drinking Water Act in the
1970s. COST recommends updating the regulations to ensure that this program is a viable
mechanism for assisting communities in meeting water supply needs.
Public Utilities Regulatory Authority (PURPA)

Telephone Pole Attachment Process
The process for negotiating telephone pole attachment agreements is extremely cumbersome and confusing. The lack of a central, statewide pole administrator 1) undermines the coordination of storm response efforts; 2) creates confusion regarding pole relocations in connection with street projects, such as street widening and tree trimming; 3) subjects municipalities to duplicative fees and inconsistent contractual obligations; 4) and impedes the ability of municipalities to connect to the state’s Nutmeg Network.

COST strongly supports the appointment of a single, statewide pole administrator to assist municipalities in: 1) Negotiating municipal attachment agreements; 2) Developing a database that assists municipalities and other stakeholders in identifying pole locations; 3) Providing towns with assistance in preparing and submitting applications; 4) Addressing concerns regarding communication between pole owners and attachers; and 5) Resolving issues that may impede municipal access to the state’s Nutmeg Network – a public broadband fiber network.

In addition, COST supports efforts to move to a single software/database system that could be administered by the Single Pole Administrator, such as the NOTIFY system currently in use by CL&P.

Recognizing these concerns, the Public Utilities Regulatory Authority has initiated a docket to determine whether to proceed with a single pole administrator. We urge support to make resolution of this issue an administrative priority.

Department of Revenue Services

The state Department of Revenue Services should clarify via regulations that the state and municipal real estate conveyance tax is applicable to an entire land transaction. Currently, some real estate developers have taken advantage of an apparent loophole in the law by selling the land in a separate transaction from the sale of the residence built on the land in order to reduce the liability of the real estate conveyance tax.

Department of Social Services

COST supports efforts to increase Medicaid reimbursement levels for emergency ambulance transportation services. Because reimbursement levels were reduced in previous years, municipal employers have had to shoulder more of the costs for this care. This is a particular problem in rural areas where patients have to be transported over a large geographic area. Shifting more costs onto already escalating municipal health insurance premiums is imposing a significant burden on small towns and cities.

Department of Transportation

The process for obtaining approval from the state Department of Transportation (DOT) on road and bridge projects is very time-consuming, delaying projects.
A new law adopted last session may help address some of these issues. The act created a local transportation capital program to allow DOT to request authorization of special tax obligation bonds to provide funding to municipalities or local planning agencies for state or municipal road and facility improvements. We will continue to solicit input from our members regarding specific concerns with the approval process for roads and bridges and provide you with more detailed information on this issue.

Municipal Economic Development Projects
Municipalities often find it difficult to move forward with various municipal economic development projects given the number of approvals required from various state agencies. Smaller communities would certainly benefit from efforts to create a one-stop shopping mechanism to assist municipalities in obtaining technical expertise and direction in addressing concerns resulting from the oversight of multiple state agencies.

COST will continue to solicit input from its members regarding burdensome or inefficient regulations to assist your office in its efforts to improve the administration of various programs and services. If you have any questions, please contact me at 860-841-7350.

Thank you for the opportunity to comment.
December 16, 2013

Governor Dannel P. Malloy
State Capitol
210 Capitol Avenue
Hartford, CT 06106

Re: CCPA Comments to Executive Order #37, Streamlining State Regulations

Dear Governor Malloy:

The Connecticut Community Providers Association (CCPA) appreciates the opportunity to comment on Executive Order #37, which aims to streamline state regulations and recall or review those regulations that are duplicative, outdated, unnecessarily burdensome, inefficient or ineffective. We believe this is an important first step towards ensuring that all regulatory benefits justify their costs.

CCPA is the premiere state trade association representing organizations that provide health and human services and supports for children, adults and families in the areas of mental health, substance use disorders, developmental disabilities, child and family health and well being, and other related issue areas. Community providers deliver quality health and human services to 500,000 of Connecticut’s residents each year, ensuring compliance with DMHAS, DCF, DSS, DPH, and DDS regulations throughout each step of the way. However, over many years, and with the implementation of ACA and focus on accountability and payment structure reform, administrative burdens upon behavioral health providers have grown enormously and without coordination.

Administrative burdens are, in some cases, duplicative across state health and human service agencies and often layered upon each other. While oversight, accountability, licensing, data collection, payment reform, outcomes and other contractual and regulatory requirements are necessary and welcomed by the provider community, the lack of regulatory cohesion is concerning and must be addressed in order to refocus efforts towards providing the highest quality and most cost-effective services possible.

Within this context, CCPA supports Executive Order #37 and respectfully submits the following list of regulatory barriers experienced by nonprofit community providers:

1. **DATA REPORTING REQUIREMENTS**: Data reporting requirements across state health and human service agencies are overwhelming nonprofit providers, as each agency has developed its own set of standards, resulting in a wide range of data being collected, and perhaps underutilized, by multiple agencies.
Issues associated with multiple data reporting requirements are compounded by the recent trend in utilizing evidence based treatment models and electronic health records. For example, a recently released RFP by a state agency required the use of an evidence based practice (EBP), electronic health records system that meets national standards, and the utilization of the GAIN assessment system. Given that EBP have proprietary data reporting requirements, a provider interested in pursuing such an RFP would be required to submit four different data sets to (1) the state agency, (2) the EHR system, (3) the proprietor of the EBP, and (4) GAIN.

It is proposed that data reporting requirements are streamlined across all state health and human service agencies (DCF, DPH, DMHAS, DSS) in order to effectively allocate provider resources and ensure that only necessary, useful data is being reported and utilized with the goal of improving service provision.

2. LICENSING REQUIREMENTS: Lack of coordination between state agencies that license and fund behavioral healthcare organizations is a barrier to service provision. Currently, nonprofits that provide substance use services must be licensed by DPH. Additionally, if a provider also serves both children and adults with co-occurring mental health and substance use disorders, they must be licensed by both DMHAS and DCF.

These multiple licensing requirements pose structural barriers for providers who employ a holistic, family centered approach in which they attempt to integrate both mental health and substance use services for adults and children. The division of mental health and substance use licensing perpetuates the division between services rather than recognizing that individuals are increasingly being diagnosed with co-occurring disorders such as depression and substance use. Furthermore, the volume of licensing reviews and redundancies in such reviews is a burden to providers in terms of resources and time.

It is proposed that the licensing of mental health and substance use services be reviewed and streamlined, if possible, to ensure consistency when serving children and adults with co-occurring behavioral health disorders.

3. AUDIT REGULATIONS: Multiple and overlapping audit requirements are a barrier to service provision for nonprofit community providers, as providers dedicate much time and resources to ensure compliance with each audit, including those by: DSS, DCF, DPH mental health audits, DPH substance use audits, or ECC audits. Multiple, overlapping audits have far reaching implications for all nonprofit community providers, considering that audit penalties can often result in thousands of dollars owed back to the state by providers. The stakes are higher for providers with multiple sites, as each site is required to undergo an individual review process, which may take anywhere between one month to an entire year to complete. It is proposed that the state review all audit requirements for nonprofit community providers to identify and address overlaps, inconsistencies, or redundancies within the state auditing processes.

4. REGULATIONS REGARDING PRIVILEGES AND DISCLOSURES: Behavioral health organizations must comply with HIPAA, 42 CFR Part 2 (the substance abuse confidentiality regulations) (“Part 2”) and the Connecticut mental health privileges. Chapter 899 of the CT statutes contains language regarding privileges and disclosures. With healthcare reform and the focus on coordinated and integrated care, the CT statutes provide challenges to doing so, especially around referrals and following-up with referral sources. Once a referred individual is seen, authorizations can generally
be executed, if the client agrees to do so. This differs from other types of health providers, physician practices etc. that need to comply with HIPAA, (which allows for disclosures for treatment purposes or coordination of care), but not with these other CT state statutes. The CT regulations pose a barrier to coordination of care which is not in line with healthcare reform.

5. INTEGRATION OF BEHAVIORAL AND PHYSICAL HEALTH SERVICES: Co-location of behavioral health services in primary and other health care settings provides improved, integrated care for individuals with co-occurring physical and behavioral health conditions, resulting in better outcomes. Current DPH licensure regulations restrict clinic practice to physical locations specifically approved by the Department. There is no provision- short of full licensing of a new site- for the deployment of clinical resources from a licensed clinic to an “off-site” location in order to facilitate coordination of care and the delivery of services in the most appropriate setting for the patient.

Precedent for the provision of “off-site” services by a licensed clinic can be found in the Department of Children and Families’ licensure regulations for Outpatient Psychiatric Clinics for Children. In the Department’s regulations “clinic off-site services” are defined as follows:

“Clinic services provided at a location which is not physically a part of the licensed clinic but whose services emanate from the licensed clinic. Such locations may include the recipient’s home, acute care hospital, school, recreational center or similar provisional location. Off-site services do not require separate licensing but shall be specified in the licensing process as locations where services are provided.”

It is proposed that the Public Health statutes governing the licensure of psychiatric clinics for adults and the licensure of facilities for the treatment of substance abusing persons be amended to allow licensed clinics to provide “off-site” services in a similar fashion as is provided for in the DCF licensure regulations, with specific reference to physician offices and other health care settings.

Thank you very much for your consideration. CCPA looks forward to working in collaboration with the administration to address the abovementioned regulatory concerns of nonprofit community providers.

Sincerely,

Brunilda Ferraj, MSW
Public Policy Specialist
Connecticut Community Providers Association (CCPA)
35 Cold Spring Rd, Suite 522
Rocky Hill, CT 06067
860-257-7909 (P)
860-257-7777 (F)
bferraj@ccpa-inc.org
To: Office of Governor Dannel P. Malloy  
From: Guy Russo  
    President, Connecticut Water Works Association (CWWA)  
Date: December 16, 2013  
Re: Public Comments - Executive Order No. 37  
    Outdated, Unnecessarily Burdensome, Inefficient or Ineffective Regulations

Thank you for the opportunity to submit comments in response to Executive Order No. 37 regarding outdated, unnecessarily burdensome, inefficient or ineffective regulations. The Connecticut Water Works Association (CWWA) commends your efforts to identify opportunities to eliminate and/or update burdensome regulations.

Our members, who are comprised of municipal water departments, private water companies and regional water authorities, identified the following laws and regulations that are outdated, burdensome or otherwise inefficient.

Recognizing the value of periodically reviewing and updating agency regulations, we encourage you to consider adopting a process that allows for public comment on a regular basis.

We would further note that there are some cases where the concern may not be with the regulations as written, but with the interpretation or application of the regulations by agency staff. There is often an unwillingness by agency staff to find a practical interpretation of the regulations, and an overreliance on a literal read that may not meet the regulatory intent or lead to a reasonable application. There can also be an ‘escalation of expectations’ by agency staff that may lead to a request for information that is inconsistent with the regulations or their intent. These issues may not be able to be remedied with a rewrite of any particular regulation, but must be addressed by setting clear expectations for agency staff so they do not overreach their authority.

**Water Planning – State Department of Public Health**


   **Recommendation:** Address delays in reviewing and approving Water Supply Plans, which are required to be prepared and submitted to the state Department of Public Health (DPH) by water companies serving 1,000 or more persons, by 1) narrowing the scope of the plans to data that is relevant to water supply planning; 2) standardizing the format for plan
submittals; 3) eliminating requests for information which are already on file with DPH; and 
4) ensuring that plans are reviewed and approved within one year from submittal.

**Rationale:** The Water Supply Plan is a long range planning document which includes an 
analysis of present and future water supply demands based on a fifty-year planning horizon. 
Although it is a useful planning tool, the format and approval process must be streamlined 
and standardized to ensure that the data is useful and in a format that certain water supply 
data made publicly available to support statewide water use planning. It is not necessary or 
appropriate to require information in the plans that is already available and provided to the 
department through routine reporting or ongoing regulatory inspections. Recapping all that 
data in a single place is simply not necessary.

Under the current process, water companies may wait from one to four years to obtain 
approval of its water supply plan from the state Department of Public Health (DPH), with 
some companies waiting as long as 6 years. Even more frustrating, however, is that once 
the plan is submitted to DPH, DPH is taking several months to several years to make the 
initial review and request additional information/clarification from the water companies. 
Although DPH acknowledges these concerns and has made some progress in addressing 
them, continued delays result in situations where companies are asked to provide 
additional information on system components that have changed considerably. In addition, 
staff or consultants may have changed, requiring companies to expend considerable 
resources to piece together the information DPH is requesting. DPH also requires that the 
information requested be provided in 30 days. Moreover, DPH is requesting responses to 
comments on issues that had already been approved in previous plans, on issues that have 
already been resolved since the plan was submitted, or on activities that occurred following 
the submittal of the plan.

The current process imposes significant and unnecessary costs on both water companies 
and DPH staff, who are required to expend countless hours and thousands of dollars 
completing, updating and reviewing water supply plans that include information which is 
irrelevant, outdated or redundant. Water companies identified numerous examples of 
irrelevant and outdated data required to be provided, including:

- **Fire flow test data** – Rather than require summary data regarding fire flow testing, the 
department has required complete fire flow test data, which is a significant quantity of 
information that is not relevant to water supply planning
- **Dam surveys, inspection reports**, which are already provided to the department
- **Storage tank inspection reports**
- **Sizes of chemical feeds, tanks, plant schematics, details of meter replacement program**
- **Size, type, age, material & condition of piping by street**
- **Tables to monitor when water distribution pipes are replaced by street address, future 
main replacements and when radio read meters are to be installed**
- **Survey of the tops of each well and comparison to 100-year elevation**
• Redundant information such as a distribution map, service map, easement descriptions and maps, which were already provided to the department
• Copies of studies that have been submitted to DPH
• Operator Certifications which are already on file with DPH

CWWA appreciates DPH’s efforts to initiate a process to reformat the water supply plans. However, this effort has been bogged down for a variety of reasons. Given the considerable amount of department staff time that must directed to the review and approval of these plans, standardizing the format, narrowing the scope of the plans and ensuring timely reviews and approvals, should be a top priority. Addressing these issues will also help address concerns regarding the process for reviewing the plans to determine whether certain water security related information may be disclosed under the state Freedom of Information Act.

2. Connecticut Plans for Public Water Supply Coordination – Section 25-33, CGS; Section 25-33h-1, RCSA

Recommendation: Review the regulations for Public Water Supply Coordination to 1) streamline the process; 2) consolidate the Public Water Supply Management Areas; and 3) ensure that plans are completed and approved for the entire state.

Rationale: It is essential for public water utilities to be able to adequately plan for the current and future water supply needs of the customers and communities they serve. There are existing mechanisms in place in Connecticut that require water companies to prepare individual water supply plans and authorize the development of a coordinated approach for a broader state plan under the Water Utility Coordinating Committee (WUCC) process. Although the WUCC governing laws have been in effect since 1985 and various plans have been filed, the implementation has fallen far short of expectations.

To date, only 4 of the 7 defined areas (WUCCs) for state water planning have been convened and only 1 plan has been approved. Unfortunately, the lack of coordinated planning for public water supplies has created a significant gap as the state strives to develop a Statewide Water Plan because these efforts should serve as the cornerstone of any broader state planning efforts.

DPH Regulatory Reviews and Processes

3. Change of Use Permits – Section 25-32, CGS; Section 25-37d-1, RCSA

Recommendation: Limit the activities that trigger a “Change of Use” permit from the state Department of Public Health to land use activities that are substantially different from the current use of the property for water supply purposes or activities that could potentially affect the purity and adequacy of the potable water supply. Maintenance and/or upgrades to existing water utility infrastructure should not require a permit.
**Rationale:** Under the current process, a wide range of routine activities may trigger a request for a Change of Use permit. For example, stone revetment, which is performed to protect embankments from erosion, as well as the installation of underground electrical wires to a wellfield to prevent storm damage, have been considered a change of use by the department. In fact, the Department has frequently used the guideline of “one shovel of dirt” disturbance at a wellfield as requiring a change of use permit. However, none of these activities are a “change of use” but necessary activities to maintain or protect the system. In addition, the installation of a replacement well should not be considered a “change of use” since it is replacing a well that has already been approved and the activity is for water supply purposes. However, DPH requires a Change of Use permit for this activity. The breadth of information required to be submitted as part of the Change of Use Application, see Appendix I, is simply not appropriate given the routine nature of many of these activities the department considers a change of use. The department should limit the scope of activities that trigger the permit requirements which would free up staff to focus on core public water supply oversight tasks.

4. ** Expedite Permit Processing and Other Approvals**

**Recommendation:** Develop a Licensed Water Professional Program to assist state agencies in processing permits and approving water supply plans in a timely manner.

**Rationale:** CWWA supports the creation of a Licensed Water Professional program, modeled after the successful Licensed Environmental Professional program administered by the state Department of Energy and Environmental Protection, which has streamlined certain regulatory approval processes related to brownfields remediation. The program has expedited brownfields remediation while **significantly reducing state costs** by reducing the administrative burden on staff at the state Department of Energy and Environmental Protection (DEEP) to process such approvals.

CWWA supports legislation to authorize Licensed Water Professionals to assist the state Department of Public Health in reviewing and approving certificates of public convenience & necessity and water supply plans. Due to insufficient staffing levels and cumbersome administrative processes, the review and approval of water supply plans and certificates of public convenience and necessity often takes several years. **These delays result in additional costs to public water suppliers and their customers.**

**Funding and Approval for Improvements to Deliver Potable Water**

5. **Expand Capacity of Potable Water Systems – Section 22a-471-1, RCSA**

**Recommendation:** Ensure that funding available to assist communities in installing water systems in areas served by wells that have become contaminated may be used to ensure that water service pipes are adequately sized to provide sufficient capacity in these areas.
**Rationale:** In areas where a well or wells have been contaminated, water companies are often called upon to install water systems to provide potable water to meet the public health and safety needs of residents. However, under the existing formula established in the regulations, reimbursement is limited to the installation of smaller-sized pipes to meet the short-term needs of the area, which does not provide adequate capacity for public health and fire flow. The formula does not provide any flexibility for the utility to obtain the anticipated reimbursement and then absorb the incremental costs of the increased capacity as is typically done for developers or other projects. This formula should be updated to ensure that systems may be installed that will provide sufficient capacity in these areas.

6. **Update Mechanism to Fund Water Quality and Treatment Projects – Sec. 25-33a, CGS; Section 25-33b-1-5, RCSA; Section 16-1.59b, RCSA**

**Recommendation:** Update Section 25-33a, CGS and Sections 25-33b-1through 5 of the RCSA to create a relevant mechanism to fund water quality and treatment projects.

**Rationale:** Section 25-33a, which was created in the late 1970s to support the state’s implementation of the Safe Drinking Water Act, has not been updated for a number of years. As a result, the program is no longer a viable mechanism for funding water quality and treatment projects which are needed to meet the public health needs of Connecticut’s residents.

Similarly, the ratemaking tool in Section 16-1.59b, RCSA that allows for special surcharges, as approved by the Public Utilities Regulatory Authority (PURPA), to be implemented to cover the costs of construction projects for compliance with Safe Drinking Water Act requirements was put in place when the initial compliance programs were initiated and new plants constructed to meet the new rules. It would be helpful to clarify this language to ensure that this mechanism may be allowed to be used for plant improvements or upgrades to implement current technology at those plants.

7. **Water System Acquisitions – Sections 16-46, 16-262n, 16-262o, and 16-262m, CGS**

**Recommendation:** Streamline the existing process or establish a specific process for water system acquisitions.

**Rationale:** Hundreds of small water systems continue to operate in Connecticut to supply water to residents and businesses. Unfortunately, many of these systems do not have the financial or managerial capacity to properly maintain systems and comply with stringent water quality and treatment standards. As a result, the state Department of Public Health must expend considerable resources in addressing compliance issues. Recognizing this, the state has encouraged consolidation of these systems to ensure investment in the systems and compliance with state and federal public health laws. However, the current process is very cumbersome and creates disincentives for water
companies interested in acquiring failing or other water systems.

The current regulatory framework results in a lengthy approval process that causes an administrative burden for the regulators (DPH, DEEP and PURA) as well as excessive legal fees for the utilities, and ultimately results in delays in ensuring the proper management of smaller water systems. In some cases these delays have resulted in the approval process taking over 3 years to complete even in the cases of small acquisitions (condominium complexes for instance).

Because no regulatory process currently exists to handle these types of acquisition, the state is forced to utilize several regulations that are not intended for this type of change of ownership in these cases. The regulatory requirements in place are intended for the disposal of water company lands and termination of water supply. These regulations have been required for the transfer of water company lands (wells or reservoirs) where there is no intention of changing or modifying the use of the land. The following outlines the regulatory process required for a typical change of ownership:

1. Before any water company can consider selling its sources/land, it must be sure that its water supply plan(s) is updated to reflect the sale and it must have any unused sources abandoned and any purchase water agreements in place.

2. C.G.S. 25-32d(e), CGS - Water Supply Plans – requires a water company when submitting a revision to the water supply plan which involves a forecast of land sales, abandonment of any water supply source, sale of any lands or land reclassification, shall provide notice (CMRR) to the CEO of the municipality in which the land or source is located, the Nature Conservancy, the Trust for Public Land and the Land Trust Service Bureau and any organization on the list prepared under subsection (b) of Section 16-50c.

3. C.G.S. 25-33, CGS - Requires that a water company give notice (certified mail, return receipt ("CMRR") to the Commissioner of Health of its intent to sell a water supply source. This must be done in advance of submitting an application for a permit to sell such source. Include in the letter the following: sources to sell and purchase price. Commissioner of Health determines what water companies get notices. C.G.S. 25-32(b), CGS. Requires that a water company obtain a permit from the Commissioner of DPH for the sale of water sources and classified lands. This should also include a verification of Class III land application. Also, under the DPH Drinking Water Section, a General Application is required to be submitted along with any application that requires an approval permit from the DPH. Not more than fifteen days prior to submitting an application to DPH for a permit to sell water supply sources or classified lands, a water company must give notice (CMRR) to the chief elected official or CEO of the municipality in which such lands are located.
These regulations require widespread public notice required to notify all stakeholders of their interest in the land. Although this process is important when a water utility is disposing of water supply lands, to give an opportunity for other utilities or municipalities to take ownership of the lands for drinking water purposes, they are unnecessary, costly and burdensome when there are two parties that have come to an agreement to sell the assets of a water system. While the state has taken some steps to address this by authorizing the acquiring water company to obtain a reasonable acquisition premium, the process itself remains burdensome. Under current law, DPH and PURA must concurrently review applications, hold hearings in many cases and render joint decisions when an entity acquires the holdings/assets of another water company, voluntarily or involuntarily, or when a new water company is created and constructed. This process needs to be streamlined, or a new regulatory process established for the sale of water company assets from one utility to another when there is no intention of changing use of the assets. Consideration should be given to an expedited process and ‘preapproval’ certification for acquiring entities that have clearly demonstrated that they have the technical, financial and managerial capacity to acquire such systems. Recently, DPH has outlined a framework for such regulations that is a step in the right direction, and would significantly reduce administrative burden and cost.

8. Permitting – Use of Excess Water during Emergencies

Recommendation: Clarify that permits are not required for the use of excess water during emergencies.

Rationale: Section 22a-358, C.G.S. requires a permit for a public water system to sell water reserves in excess of those required to maintain an abundant supply of water to customers in its service area. The state Department of Public Health has interpreted this statute to require a permit application to be submitted and approved even if the sale of excess water is for emergency use only. The type of information requested as part of the permit application, however, is generally not applicable to the sale of excess water for emergency use. Moreover, the time needed to complete an application and obtain the necessary approval may undermine the provision of water for emergency purposes.

DEEP Diversion Programs

9. Diversion Permit Requirements for Certain Wells Connected to a Public Water Supply Distribution System

Recommendation: Revise the definition of “connected in a system” to eliminate the requirement that a water company must obtain a diversion permit for wells that withdraw less than 50,000 gallons per day (gpd) when they are connected in a public water supply distribution system that withdraws more than 50,000 gpd.
**Rationale:** Generally, diversion permits are only required for wells that withdraw more than 50,000 gallons per day, recognizing that anything beneath this threshold is unlikely to impair the environment or aquatic resources. However, the state Department of Energy & Environmental Protection (DEEP) requires a permit for a well withdrawing less than 50,000 gpd if it is connected to a well system that withdraws more than 50,000 gpd. The inefficiency that DEEP’s interpretation creates is that two systems with existing sources less than 50,000 gpd can’t be connected to each other even if the withdrawal from the sources will remain below 50,000 gpd. If they are connected, then all sources must be permitted at significant cost even if withdrawals will remain below the supposedly minimal impact threshold of 50,000 gpd.

**PURA Regulations/Policies**

10. **Imposition of Late Charges on Water Utility Bills – PURA Policy**

**Recommendation** – Allow water companies to impose late charges on unpaid bills after 28 days rather than one full month to eliminate confusion when late charges appear on the next month’s bill.

**Rationale** – Electric and gas companies are permitted to impose late charges on a customer’s bill after 28 days rather than one full month. This allows the late charges to be included on the next month’s bill rather than the bill that is issued after the second month. Customers are often confused when they receive a bill with late charges for an unpaid bill from two months ago.

11. **Installation of Service Lines that Cross Intervening Property Lines – Section 16-11-64, RCSA**

**Recommendation:** Provide that a water utility may allow a property owner to install a water service pipe that crosses intervening properties provided the property owner demonstrates to the water utility that 1) an alternative ownership of a suitable strip of land to establish frontage on a road is not feasible; (2) the proposed service line will ultimately serve no more than one premises; 3) proper easements are in place prior to the installation of the line; 4) the construction complies with the Company’s Rules and Regulations; and 5) there is adequate water pressure to serve the property.

**Rationale:** Under the current regulations, a utility or property owner must submit a written request to the Public Utilities Regulatory Authority (PURA) and a docket is initiated for an exception to allow a service pipe to cross intervening properties “only under very exceptional hardship circumstances and then only on a case by case basis”. However, there are circumstances when installing a service line that crosses an intervening property line is more feasible and prudent than installing a main extension. Under the regulations, the ability to request an exception is very limited and cumbersome. As the vast majority of
these are approved, it would seem that there would be a benefit to simplifying the process for installing such lines is needed to address these concerns.

12. PURA Oversight regarding the Sale, Lease, Assignment or Mortgage of Real Property – Section 16-43(2), CGS and Land Transactions

**Recommendation:** 1) Increase the value of property that may be sold, leased, assigned, mortgaged or otherwise disposed of subject to the approval of the Public Utilities Regulatory Authority (PURA) from an appraised value of $50,000 or less to $100,000 or less and 2) Increase the value of land subject to a public hearing under Sec. 16-50c(b), CGS from $50,000 to $100,000.

**Rationale:** This provision has not been updated to reflect changes in property values, unnecessarily subjecting relatively minor land transactions to regulatory oversight and public hearings.

13. DEEP Permit Processing Timeframes

**Recommendation – Continue to Improve the Efficiency of DEEP Permit Processing.**

**Rationale:** The state Department of Energy & Environmental Protection (DEEP) has implemented LEAN practices and taken other steps to improve the permit process. For example, DEEP has implemented an intake process to provide timely notice to applicants that an application is incomplete or somehow deficient. This has been successful in providing applicants with an opportunity to correct any deficiencies needed to process the permit, improving the efficiency of the overall permitting process.

In addition, CWWA and other stakeholders worked with DEEP several years ago to create additional categories of general permits. These efforts were successful in building more flexibility and certainty into the general permit process by moving forward with the following initiatives: 1) Filing-only Permits – A filing only permit eliminates unnecessary delays experienced by water utilities for activities that have no or minimal environmental impact; 2) Duration of General Permit – Extending the duration of the general permit from five years to ten reduced costs associated with filing general permit applications; 3) Renewal Application – Changes to the renewal application process included a streamlined, short-form process, which helped to provide certainty that previously authorized activities may continue without interruption; 4) New Categories of General Permits – DEEP developed new categories of general permits which will greatly improve efficiency, such as the 1) Interconnection and Transfer of up to 100,000 gpd and 500,000 gpd; and 2) Withdrawal of up to 100,000 gpd – Bedrock Aquifer.
14. DEEP Permit Processing – Scope of Review Authority

**Recommendation:** Limit DEEP’s scope of authority in reviewing permit applications to issues directly related to the effect of the diversion on water resources.

**Rationale:** DEEP appears to be exceeding its statutory authority in reviewing and approving certain permits. Although DEEP may request information from an applicant for a permit to divert water for a new consumptive use regarding the effect of the diversion on issues such as stream flows or aquatic habitat needs, DEEP should not be permitted to request information that is not impacted by the diversion, such as a business operation on the property or the property itself. In addition, DEEP should not be using water diversion permit applications to regulate activities that are not physically or hydraulically related to the regulated diversion. Rather, DEEP’s jurisdiction should be limited to the hydraulic and related impacts resulting from a diversion of water.

15. General Permit for Water Treatment Wastewater Discharges

**Recommendation:** Modify the general permit for water treatment wastewater discharges to create a workable general permit by: 1) expanding the definition of water treatment facility to include potable water storage tanks; 2) clarifying that certain discharges are exempt from monitoring and record-keeping requirements; 3) increasing the maximum daily flow of all discharges on one site; 4) raising or eliminating the maximum groundwater discharge limits for iron and manganese; 5) deleting the monitoring requirement.

**Rationale:** These changes are needed to improve the efficiency of this General Permit and better reflect industry practices.

16. Burdensome and Unnecessary Agency Data Collection and Reporting Requirements

**Recommendation:** Ensure that agencies review and update regulations to eliminate redundant, outdated and irrelevant regulations on a regular basis.

**Rationale:** The state Department of Public Health is in the process of adopting comprehensive regulations (Section 19-13-B102, RCSA) which include certain reporting and monitoring requirements, including raw water monitoring, herbicide and pesticide monitoring. These reporting requirements should replace existing water company reporting requirements or water companies will be subjected to costly, duplicative reporting requirements.

In addition, the state is currently exploring how to develop a data collection framework to assist the state in statewide water use planning. The state should review existing data collection requirements on water companies to ensure that new data requirements do not impose duplicative requirements on water companies.
Conclusion

Again, thank you for the opportunity to provide input on laws, regulations and agency interpretations that impose unnecessary and/or duplicative requirements on water companies. We believe this effort will help ensure that water companies can continue to provide Connecticut’s residents and businesses with a safe, ample supply of public water supplies to meet the state’s public health, safety and economic development needs.

CWWA
1245 Farmington Ave., 103
West Hartford, CT 06107
Tel. 860-841-7350
www.cwwa.org
The Connecticut Automotive Retailers Association (CARA) represents more than 240 new franchised motor vehicle retailers in the state of Connecticut. CARA member dealers employee over 13,000 people in dealerships around this state and account for 15.3% of all retail sales. We appreciate the Governor’s efforts to ease unnecessary regulatory burdens on Connecticut businesses.

CARA respectfully requests that the Governor’s Taskforce on Obsolete State Regulations consider deleting any existing regulations preventing dealers from using electronic records and adopting any necessary regulations to allow the use of electronic records. Current statutes (see CGS Sec. 14-61b. Dealer records, documents and forms maintained in electronic format) permit auto dealers who have the ability to scan MVD documents to use electronic documents in lieu of paper documents. However, the Department of Motor Vehicles (DMV) has failed to adopt any updated regulations pursuant to the new statute allowing dealers to keep electronic documents in lieu of paper records. The cost to dealerships for storage, maintenance of a manual system and recall of these records manually is significant. It seems that DMV should now adopt new regulations and allow dealers to use electronic records and forms. Any regulations prohibiting this should be repealed and new regulations allowing electric recordkeeping should be promptly submitted to Regulations Review and adopted pursuant to the Connecticut Statutes.

Respectfully submitted,

James Fleming
President - Connecticut Automotive Retailers Association
On behalf of the Connecticut Heating & Cooling Contractors Association (CHCC), thank you for the opportunity to provide comments in response to Executive Order # 37 with regard to regulations that are “outdated… insufficient, or ineffective”. As such, CHCC suggests modifying regulations of the Department of Consumer Protection concerning certain heating & cooling licenses.

Specifically, CHCC suggests clarifying the scope of the existing S-9 and S-10 license categories for certain HVAC contractors and journeypersons by including language that reflects “warm air” work. This common-sense change would greatly benefit many members of the heating & cooling industry and reflects modern HVAC industry practices.

Please see draft suggested language that follows, which would modify subsections (e) and (f) of R.C.S.A. Sec. 20-332-5.

Thank you again for the opportunity to comment, and please do not hesitate to contact CHCC should you require additional information.
(e) Limited heating cooling contractor’s license (S-9).

The holder of this license may perform only work limited to warm air hot water or steam heating systems, and the cooling work in installation, repair, replacement, maintenance or alteration of any warm air, air conditioning and refrigeration system, including necessary piping for the conveyance of heating or cooling media and associated pumping equipment and air distribution for buildings not over three stories high, with total heating load not exceeding 500,000 BTU’S per system, steam pressure not exceeding fifteen pounds, and/or cooling installations up to 35 tons per system. This license also covers the installation or servicing of oil burners handling up to five gallons per hour as well as LP gas supplied by gas containers and/or natural gas piping for work covered by this limited license. The requirements to qualify for this license examination shall be two (2) years as a properly licensed journeyperson or equivalent experience and training.

The proposed changes reflect what the initial intent of the license was to entail and limit. The license fills the gap between the Unlimited S-1 classification and a residential light commercial applicability.

(f) Limited heating cooling journeyperson’s license (S-10).

The holder of this license may perform work only while in the employ of a licensed contractor and only limited to warm air, hot water or steam heating systems and cooling work in installation, repair, replacement, maintenance or alteration of any warm air, air conditioning and refrigeration system, including necessary piping for the conveyance of heating or cooling media and associated pumping equipment and air distribution for buildings not over three stories high, with total heating load not exceeding 500,000 BTU’S per system, steam pressure not exceeding fifteen pounds, and/or cooling installations up to 35 tons per system. This license also covers the installation or servicing of oil burners handling up to five gallons per hour as well as LP gas supplied by gas containers and/or natural gas piping for work covered by this limited license. The requirements to qualify for this license examination shall be the completion of a registered apprenticeship program or equivalent experience and training.
The comments below are being submitted per Executive Order No. 37 on behalf of FairWindCT by Joyce Hemingson.

FairWindCT
PO Box 225
Colebrook, CT 06021

To: Office of the Governor
From: Joyce Hemingson
Date: December 16, 2013
Re: Addition of regulations for noise from industrial wind turbines to the Regulations of Connecticut State Agencies, Department of Energy & Environmental Protection, Control of Noise regulations, Sec. 22a-69-1 through 22a-69-7.4.

Connecticut’s Control of Noise regulations date to 1978, prior to the introduction of large-scale industrial wind turbines. The regulations need revising to protect the health of residents from these huge stationary noise sources, which can be up to 500 feet tall. Governor Malloy’s Executive Order No. 37 solicits public comment on “regulations that have been in effect greater than four years and whether such regulations are outdated, unnecessarily burdensome, insufficient, or ineffective.” The current Control of Noise regulations are outdated, insufficient and ineffective regarding industrial wind turbines. They allow an industrial use to emit 61 dBA during the day and 51 dBA at night to residential property lines.

Governor Malloy further stated, “We must always ensure that we’re providing for the health and well-being of our citizens and our environment, but we should always challenge ourselves to make sure we’re striking the right balance. And, most important, we should invite the public to challenge us to.”

It is well known that noise affects human health. The World Health Organization (WHO) recommends limiting sound to a maximum of 40 dBA at the exterior of residences (see attached files WHOa68672.pdf and WHOE92845.pdf). Noise from industrial wind turbines is being regulated worldwide. Germany uses a noise night limit of 35 dBA in purely residential areas. Audible sound as well as infrasound is considered.

In the U.S., the National Association of Regulatory Utility Commissioners recommends regulating industrial wind turbine noise (see attached file NARUC18b517ca-d2c3-4edc-adb4-b7f9ff8d88b2.pdf). Here in New England, Maine has industrial wind turbine noise regulations in place, with a nighttime limit of 42 dBA at any protected location (see attached file ME-096c375.pdf). The Massachusetts’ Department of Public Utilities opened a docket on October 31, 2013 on the Best Practices for the Siting of Land-Based Wind Energy Facilities (including human health and safety), and on December 12, 2013, the State of Vermont Public Service Board opened an investigation on electric generation facilities, noting that “The quantity and quality of sound emissions from proposed facilities have the potential for impacts under each of these categories” -- aesthetics, air quality and public health and safety.

Noise experts know that noise levels louder than 45 dBA will cause a high negative community response and “vigorous community action” in the form of appeals to officials and threats of legal action. Sound levels should determine the setback distance of industrial wind turbines from occupied buildings. If placed too close to people, industrial wind turbines will generate lawsuits. A judge’s recent ruling in Falmouth, Mass., resulted in the significant curtailment of two industrial wind turbines there. The turbines are only allowed to run from 7 am to 7 pm six days a week, and must be shut off entirely on Sundays and three major holidays. There is a balance between producing renewable energy and protecting public health. Science-based Control of Noise regulations can prevent situations similar to that of Falmouth and other towns in Massachusetts and Vermont from being repeated in Connecticut.

Noise from industrial wind turbines has characteristics that are unlike most other sources of community noise. The noise from most community noise sources is concentrated in the mid (audible) and high level energy ranges and attenuates about 6 dB every time the distance from the noise source is doubled. The noise from industrial wind turbines is predominately in the low frequency and infrasound ranges (below 200 Hz) and that attenuates about 3 dB every time the distance from the noise source is doubled. The bulk of sound energy coming from industrial wind turbines is not in the audible range, but in frequencies below that. It is this non-audible, low frequency and infrasound noise that seems responsible for the nausea, migraines and the feeling of motion sickness in some people
d. A 5 dB penalty is applied for amplitude modulation as defined following. When noise from the wind farm has perceptible or audible characteristics that are perceived by the complainant as being cause for complaint, or greater than expected, the measured sound level of the source shall have a 5 dB penalty added. Audible characteristics include tonal character measured as amplitude or frequency modulation (or both); and tonality (where the tonal character/tonality of noise is described as noise with perceptible and definite pitch or tone). Amplitude modulation is the modulation of the level of broadband noise emitted by a turbine at blade passing frequency. Amplitude modulation will be deemed greater than expected if the following characteristics apply:
i) A change in the measured LAeq, 125 ms turbine noise level of more than 3 dB (represented as a rise and fall in sound energy levels each of more than 3 dB) occurring within a 2 second period.
ii) The change identified in (i) above shall not occur less than 5 times in any one minute period provided the LAeq, 1 minute turbine sound energy for that minute is not below 28 dB.
iii) The changes identified in (i) and (ii) above shall not occur for fewer than 6 minutes in any hour.
Noise emissions are measured outside a complainant’s dwelling and shall be measured not further than 35 metres from the relevant building, and not closer than within 3.5 metres of any reflective building or surface, or within 1.2 metres of the ground.

2. Low Frequency Sound Limit
a. The LCeq and LC90 sound levels from the wind turbine at the receiving property shall not exceed the lower of either:
i) LCeq -LA90 greater than 20 dB outside any occupied structure, or
ii) A maximum not-to-exceed sound level of 50 dBC measured as the background sound level (LC90) from the wind turbines without other ambient sounds for properties located at one mile or more from State Highways or other major roads or measured as the background sound level (LC90) for properties closer than one mile.
iii) These limits shall be assessed using the same night-time and wind/weather conditions required in 1(a). Turbine operating sound emissions (LAeq and LCeq) shall represent worst case sound emissions for stable night-time conditions with low winds at ground level and winds sufficient for full operating capacity at the hub.

3. General Clause
a. Sound levels from the activity of any wind turbine or combination of turbines shall not exceed LAeq 35 dB within 100 feet of any noise sensitive premises.
b. The monitoring shall include all the sound levels as required by these noise conditions and shall include monitoring for the characteristics described in Annex A of IEC 61400-11 including infrasound, low-frequency noise, impulsivity, low-frequency modulation of broad-band or tonal noise, and other audible characteristics. Wind speed and wind direction shall be measured at the same location as the noise monitoring location.
4. Requirements
a. All instruments must meet ANSI or IEC Class 1 integrating sound level meter performance specifications.
b. Procedures must meet ANSI S12.9, IEC61400-11 and ISO1996-2
c. Procedures should meet ANSI, IEC and ISO standards applicable to the measurement of sound or its characteristics.
d. Measurements must be made when ground level winds are 2m/s (4.5 mph) or less. Wind shear in the evening and night often results in low ground level wind speed and nominal operating wind speeds at wind turbine hub heights.
e. IEC 61400-11 procedures are not suitable for enforcement of these requirements except for the presence of tones near the turbine.

5. Definitions
ANSI S12.9 Quantities and Procedures for Description and Measurement of Environmental Sound, Parts 1 to 6.
LA90, LA10 Statistical measures calculated under ANSI S12.9.
LAeq, LCeq Time average levels calculated under ANSI S12.9 or ISO 1996-2.
Noise sensitive premises includes a residence, hotel, hostel or residential accommodation premises of any type.

6. References
International Standards Organization.

As background material, I've attached the following files:
- The World Health Organization’s recommendations on noise levels (WHOa68672.pdf and WHOE92845.pdf)
- The National Association of Regulatory Utility Commissioners’ Wind Energy & Wind Park Siting and Zoning Best Practices and Guidance for States, which recommends regulating noise (NARUC18b517ca-d2c3-4edc-adb4-b7f9f8d88bb2.pdf)
- Maine Department of Environmental Protection, regulations for chapter 375 (see page 25 and following in ME-096c375.pdf)
- A Proposed Theory to Explain Some Adverse Physiological Effects of the Infrasonic Emissions at Some Wind Farm Sites, Paul D. Schomer, John Erdreich, James Boyle and Pranav Pamidighantam. 5th International Conference on Wind Turbine Noise, August 2013 (WTN13_Schomer.pdf).

Please let me know if you have any questions or would like further information. I appreciate this opportunity to submit a request for changes to Connecticut’s Control of Noise regulations and look forward to a reply from the Department of Energy and Environmental Protection on this important area of public health and safety.

Sincerely,

Joyce Hemingson, Ph.D.
President, FairWindCT
www.fairwindct.com
GUIDELINES
FOR
COMMUNITY NOISE

Edited by
Birgitta Berglund
Thomas Lindvall
Dietrich H Schwela

This WHO document on the Guidelines for Community Noise is the outcome of the WHO-expert task force meeting held in London, United Kingdom, in April 1999. It bases on the document entitled "Community Noise" that was prepared for the World Health Organization and published in 1995 by the Stockholm University and Karolinska Institute.

World Health Organization, Geneva
Cluster of Sustainable Development and Healthy Environment (SDE)
Department for Protection of the Human Environment (PHE)
Occupational and Environmental Health (OEH)
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Foreword

Noise has always been an important environmental problem for man. In ancient Rome, rules existed as to the noise emitted from the ironed wheels of wagons which battered the stones on the pavement, causing disruption of sleep and annoyance to the Romans. In Medieval Europe, horse carriages and horse back riding were not allowed during night time in certain cities to ensure a peaceful sleep for the inhabitants. However, the noise problems of the past are incomparable with those of modern society. An immense number of cars regularly cross our cities and the countryside. There are heavily laden lorries with diesel engines, badly silenced both for engine and exhaust noise, in cities and on highways day and night. Aircraft and trains add to the environmental noise scenario. In industry, machinery emits high noise levels and amusement centres and pleasure vehicles distract leisure time relaxation.

In comparison to other pollutants, the control of environmental noise has been hampered by insufficient knowledge of its effects on humans and of dose-response relationships as well as a lack of defined criteria. While it has been suggested that noise pollution is primarily a "luxury" problem for developed countries, one cannot ignore that the exposure is often higher in developing countries, due to bad planning and poor construction of buildings. The effects of the noise are just as widespread and the long term consequences for health are the same. In this perspective, practical action to limit and control the exposure to environmental noise are essential. Such action must be based upon proper scientific evaluation of available data on effects, and particularly dose-response relationships. The basis for this is the process of risk assessment and risk management.

The extent of the noise problem is large. In the European Union countries about 40 % of the population are exposed to road traffic noise with an equivalent sound pressure level exceeding 55 dB(A) daytime and 20 % are exposed to levels exceeding 65 dB(A). Taking all exposure to transportation noise together about half of the European Union citizens are estimated to live in zones which do not ensure acoustical comfort to residents. More than 30 % are exposed at night to equivalent sound pressure levels exceeding 55 dB(A) which are disturbing to sleep. The noise pollution problem is also severe in cities of developing countries and caused mainly by traffic. Data collected alongside densely travelled roads were found to have equivalent sound pressure levels for 24 hours of 75 to 80 dB(A).

The scope of WHO's effort to derive guidelines for community noise is to consolidate actual scientific knowledge on the health impacts of community noise and to provide guidance to environmental health authorities and professional trying to protect people from the harmful effects of noise in non-industrial environments. Guidance on the health effects of noise exposure of the population has already been given in an early publication of the series of Environmental Health Criteria. The health risk to humans from exposure to environmental noise was evaluated and guidelines values derived. The issue of noise control and health protection was briefly addressed.

At a WHO/EURO Task Force Meeting in Düsseldorf, Germany, in 1992, the health criteria and guideline values were revised and it was agreed upon updated guidelines in consensus. The essentials of the deliberations of the Task Force were published by Stockholm University and
Karolinska Institute in 1995. In an recent Expert Task Force Meeting convened in April 1999 in London, United Kingdom, the Guidelines for Community Noise were extended to provide global coverage and applicability, and the issues of noise assessment and control were addressed in more detail. This document is the outcome of the consensus deliberations of the WHO Expert Task Force.

Dr Richard Helmer  
Director, Department of Protection of the Human Environment  
Cluster Sustainable Development and Healthy Environments
Preface

Community noise (also called environmental noise, residential noise or domestic noise) is defined as noise emitted from all sources except noise at the industrial workplace. Main sources of community noise include road, rail and air traffic, industries, construction and public work, and the neighbourhood. The main indoor sources of noise are ventilation systems, office machines, home appliances and neighbours. Typical neighbourhood noise comes from premises and installations related to the catering trade (restaurant, cafeterias, discoteques, etc.); from live or recorded music; sport events including motor sports; playgrounds; car parks; and domestic animals such as barking dogs. Many countries have regulated community noise from road and rail traffic, construction machines and industrial plants by applying emission standards, and by regulating the acoustical properties of buildings. In contrast, few countries have regulations on community noise from the neighbourhood, probably due to the lack of methods to define and measure it, and to the difficulty of controlling it. In large cities throughout the world, the general population is increasingly exposed to community due to the sources mentioned above and the health effects of these exposures are considered to be a more and more important public health problem. Specific effects to be considered when setting community noise guidelines include: interference with communication; noise-induced hearing loss; sleep disturbance effects; cardiovascular and psycho-physiological effects; performance reduction effects; annoyance responses; and effects on social behaviour.

Since 1980, the World Health Organization (WHO) has addressed the problem of community noise. Health-based guidelines on community noise can serve as the basis for deriving noise standards within a framework of noise management. Key issues of noise management include abatement options; models for forecasting and for assessing source control action; setting noise emission standards for existing and planned sources; noise exposure assessment; and testing the compliance of noise exposure with noise immission standards. In 1992, the WHO Regional Office for Europe convened a task force meeting which set up guidelines for community noise. A preliminary publication of the Karolinska Institute, Stockholm, on behalf of WHO, appeared in 1995. This publication served as the basis for the globally applicable Guidelines for Community Noise presented in this document. An expert task force meeting was convened by WHO in March 1999 in London, United Kingdom, to finalize the guidelines. The Guidelines for Community Noise have been prepared as a practical response to the need for action on community noise at the local level, as well as the need for improved legislation, management and guidance at the national and regional levels. WHO will be pleased to see that these guidelines are used widely. Continuing efforts will be made to improve its content and structure. It would be appreciated if the users of the Guidelines provide feedback from its use and their own experiences. Please send your comments and suggestions on the WHO Guidelines for Community Noise – Guideline document to the Department of the Protection of the Human Environment, Occupational and Environmental Health, World Health Organization, Geneva, Switzerland (Fax: +41 22-791 4123, e-mail: schwelad@who.int).
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Executive Summary

1. Introduction

Community noise (also called environmental noise, residential noise or domestic noise) is defined as noise emitted from all sources except noise at the industrial workplace. Main sources of community noise include road, rail and air traffic; industries; construction and public work; and the neighbourhood. The main indoor noise sources are ventilation systems, office machines, home appliances and neighbours.

In the European Union about 40% of the population is exposed to road traffic noise with an equivalent sound pressure level exceeding 55 dB(A) daytime, and 20% are exposed to levels exceeding 65 dB(A). When all transportation noise is considered, more than half of all European Union citizens is estimated to live in zones that do not ensure acoustical comfort to residents. At night, more than 30% are exposed to equivalent sound pressure levels exceeding 55 dB(A), which are disturbing to sleep. Noise pollution is also severe in cities of developing countries. It is caused mainly by traffic and alongside densely-travelled roads equivalent sound pressure levels for 24 hours can reach 75–80 dB(A).

In contrast to many other environmental problems, noise pollution continues to grow and it is accompanied by an increasing number of complaints from people exposed to the noise. The growth in noise pollution is unsustainable because it involves direct, as well as cumulative, adverse health effects. It also adversely affects future generations, and has socio-cultural, esthetic and economic effects.

2. Noise sources and measurement

Physically, there is no distinction between sound and noise. Sound is a sensory perception and the complex pattern of sound waves is labeled noise, music, speech etc. Noise is thus defined as unwanted sound.

Most environmental noises can be approximately described by several simple measures. All measures consider the frequency content of the sounds, the overall sound pressure levels and the variation of these levels with time. Sound pressure is a basic measure of the vibrations of air that make up sound. Because the range of sound pressures that human listeners can detect is very wide, these levels are measured on a logarithmic scale with units of decibels. Consequently, sound pressure levels cannot be added or averaged arithmetically. Also, the sound levels of most noises vary with time, and when sound pressure levels are calculated, the instantaneous pressure fluctuations must be integrated over some time interval.

Most environmental sounds are made up of a complex mix of many different frequencies. Frequency refers to the number of vibrations per second of the air in which the sound is propagating and it is measured in Hertz (Hz). The audible frequency range is normally considered to be 20–20 000 Hz for younger listeners with unimpaired hearing. However, our hearing systems are not equally sensitive to all sound frequencies, and to compensate for this various types of filters or frequency weighting have been used to determine the relative strengths of frequency components making up a particular environmental noise. The A-weighting is most
commonly used and weights lower frequencies as less important than mid- and higher-frequencies. It is intended to approximate the frequency response of our hearing system.

The effect of a combination of noise events is related to the combined sound energy of those events (the equal energy principle). The sum of the total energy over some time period gives a level equivalent to the average sound energy over that period. Thus, $\text{L}_{\text{Aeq,T}}$ is the energy average equivalent level of the A-weighted sound over a period T. $\text{L}_{\text{Aeq,T}}$ should be used to measure continuing sounds, such as road traffic noise or types of more-or-less continuous industrial noises. However, when there are distinct events to the noise, as with aircraft or railway noise, measures of individual events such as the maximum noise level ($\text{L}_{\text{Amax}}$), or the weighted sound exposure level (SEL), should also be obtained in addition to $\text{L}_{\text{Aeq,T}}$. Time-varying environmental sound levels have also been described in terms of percentile levels.

Currently, the recommended practice is to assume that the equal energy principle is approximately valid for most types of noise and that a simple $\text{L}_{\text{Aeq,T}}$ measure will indicate the expected effects of the noise reasonably well. When the noise consists of a small number of discrete events, the A-weighted maximum level ($\text{L}_{\text{Amax}}$) is a better indicator of the disturbance to sleep and other activities. In most cases, however, the A-weighted sound exposure level (SEL) provides a more consistent measure of single-noise events because it is based on integration over the complete noise event. In combining day and night $\text{L}_{\text{Aeq,T}}$ values, night-time weightings are often added. Night-time weightings are intended to reflect the expected increased sensitivity to annoyance at night, but they do not protect people from sleep disturbance.

Where there are no clear reasons for using other measures, it is recommended that $\text{L}_{\text{Aeq,T}}$ be used to evaluate more-or-less continuous environmental noises. Where the noise is principally composed of a small number of discrete events, the additional use of $\text{L}_{\text{Amax}}$ or SEL is recommended. There are definite limitations to these simple measures, but there are also many practical advantages, including economy and the benefits of a standardized approach.

3. **Adverse health effects of noise**

The health significance of noise pollution is given in chapter 3 of the Guidelines under separate headings according to the specific effects: noise-induced hearing impairment; interference with speech communication; disturbance of rest and sleep; psychophysiological, mental-health and performance effects; effects on residential behaviour and annoyance; and interference with intended activities. This chapter also considers vulnerable groups and the combined effects of mixed noise sources.

*Hearing impairment* is typically defined as an increase in the threshold of hearing. Hearing deficits may be accompanied by tinnitus (ringing in the ears). Noise-induced hearing impairment occurs predominantly in the higher frequency range of 3 000–6 000 Hz, with the largest effect at 4 000 Hz. But with increasing $\text{L}_{\text{Aeq,8h}}$ and increasing exposure time, noise-induced hearing impairment occurs even at frequencies as low as 2 000 Hz. However, hearing impairment is not expected to occur at $\text{L}_{\text{Aeq,8h}}$ levels of 75 dB(A) or below, even for prolonged occupational noise exposure.

Worldwide, noise-induced hearing impairment is the most prevalent irreversible occupational hazard and it is estimated that 120 million people worldwide have disabling hearing difficulties.
In developing countries, not only occupational noise but also environmental noise is an increasing risk factor for hearing impairment. Hearing damage can also be caused by certain diseases, some industrial chemicals, ototoxic drugs, blows to the head, accidents and hereditary origins. Hearing deterioration is also associated with the ageing process itself (presbyacusis).

The extent of hearing impairment in populations exposed to occupational noise depends on the value of $L_{Aeq,8h}$, the number of noise-exposed years, and on individual susceptibility. Men and women are equally at risk for noise-induced hearing impairment. It is expected that environmental and leisure-time noise with a $L_{Aeq,24h}$ of 70 dB(A) or below will not cause hearing impairment in the large majority of people, even after a lifetime exposure. For adults exposed to impulse noise at the workplace, the noise limit is set at peak sound pressure levels of 140 dB, and the same limit is assumed to be appropriate for environmental and leisure-time noise. In the case of children, however, taking into account their habits while playing with noisy toys, the peak sound pressure should never exceed 120 dB. For shooting noise with $L_{Aeq,24h}$ levels greater than 80 dB(A), there may be an increased risk for noise-induced hearing impairment.

The main social consequence of hearing impairment is the inability to understand speech in daily living conditions, and this is considered to be a severe social handicap. Even small values of hearing impairment (10 dB averaged over 2 000 and 4 000 Hz and over both ears) may adversely affect speech comprehension.

*Speech intelligibility* is adversely affected by noise. Most of the acoustical energy of speech is in the frequency range of 100–6 000 Hz, with the most important cue-bearing energy being between 300–3 000 Hz. Speech interference is basically a masking process, in which simultaneous interfering noise renders speech incapable of being understood. Environmental noise may also mask other acoustical signals that are important for daily life, such as door bells, telephone signals, alarm clocks, fire alarms and other warning signals, and music.

Speech intelligibility in everyday living conditions is influenced by speech level; speech pronunciation; talker-to-listener distance; sound level and other characteristics of the interfering noise; hearing acuity; and by the level of attention. Indoors, speech communication is also affected by the reverberation characteristics of the room. Reverberation times over 1 s produce loss in speech discrimination and make speech perception more difficult and straining. For full sentence intelligibility in listeners with normal hearing, the signal-to-noise ratio (i.e. the difference between the speech level and the sound level of the interfering noise) should be at least 15 dB(A). Since the sound pressure level of normal speech is about 50 dB(A), noise with sound levels of 35 dB(A) or more interferes with the intelligibility of speech in smaller rooms. For vulnerable groups even lower background levels are needed, and a reverberation time below 0.6 s is desirable for adequate speech intelligibility, even in a quiet environment.

The inability to understand speech results in a large number of personal handicaps and behavioural changes. Particularly vulnerable are the hearing impaired, the elderly, children in the process of language and reading acquisition, and individuals who are not familiar with the spoken language.

*Sleep disturbance* is a major effect of environmental noise. It may cause primary effects during sleep, and secondary effects that can be assessed the day after night-time noise exposure. Uninterrupted sleep is a prerequisite for good physiological and mental functioning, and the primary effects of sleep disturbance are: difficulty in falling asleep; awakenings and alterations
of sleep stages or depth; increased blood pressure, heart rate and finger pulse amplitude; vasoconstriction; changes in respiration; cardiac arrhythmia; and increased body movements. The difference between the sound levels of a noise event and background sound levels, rather than the absolute noise level, may determine the reaction probability. The probability of being awakened increases with the number of noise events per night. The secondary, or after-effects, the following morning or day(s) are: reduced perceived sleep quality; increased fatigue; depressed mood or well-being; and decreased performance.

For a good night’s sleep, the equivalent sound level should not exceed 30 dB(A) for continuous background noise, and individual noise events exceeding 45 dB(A) should be avoided. In setting limits for single night-time noise exposures, the intermittent character of the noise has to be taken into account. This can be achieved, for example, by measuring the number of noise events, as well as the difference between the maximum sound level and the background sound level. Special attention should also be given to: noise sources in an environment with low background sound levels; combinations of noise and vibrations; and to noise sources with low-frequency components.

Physiological Functions. In workers exposed to noise, and in people living near airports, industries and noisy streets, noise exposure may have a large temporary, as well as permanent, impact on physiological functions. After prolonged exposure, susceptible individuals in the general population may develop permanent effects, such as hypertension and ischaemic heart disease associated with exposure to high sound levels. The magnitude and duration of the effects are determined in part by individual characteristics, lifestyle behaviours and environmental conditions. Sounds also evoke reflex responses, particularly when they are unfamiliar and have a sudden onset.

Workers exposed to high levels of industrial noise for 5–30 years may show increased blood pressure and an increased risk for hypertension. Cardiovascular effects have also been demonstrated after long-term exposure to air- and road-traffic with LAeq,24h values of 65–70 dB(A). Although the associations are weak, the effect is somewhat stronger for ischaemic heart disease than for hypertension. Still, these small risk increments are important because a large number of people are exposed.

Mental Illness. Environmental noise is not believed to cause mental illness directly, but it is assumed that it can accelerate and intensify the development of latent mental disorders. Exposure to high levels of occupational noise has been associated with development of neurosis, but the findings on environmental noise and mental-health effects are inconclusive. Nevertheless, studies on the use of drugs such as tranquillizers and sleeping pills, on psychiatric symptoms and on mental hospital admission rates, suggest that community noise may have adverse effects on mental health.

Performance. It has been shown, mainly in workers and children, that noise can adversely affect performance of cognitive tasks. Although noise-induced arousal may produce better performance in simple tasks in the short term, cognitive performance substantially deteriorates for more complex tasks. Reading, attention, problem solving and memorization are among the cognitive effects most strongly affected by noise. Noise can also act as a distracting stimulus and impulsive noise events may produce disruptive effects as a result of startle responses.

Noise exposure may also produce after-effects that negatively affect performance. In schools around airports, children chronically exposed to aircraft noise under-perform in proof reading, in
persistence on challenging puzzles, in tests of reading acquisition and in motivational capabilities. It is crucial to recognize that some of the adaptation strategies to aircraft noise, and the effort necessary to maintain task performance, come at a price. Children from noisier areas have heightened sympathetic arousal, as indicated by increased stress hormone levels, and elevated resting blood pressure. Noise may also produce impairments and increase in errors at work, and some accidents may be an indicator of performance deficits.

**Social and Behavioural Effects of Noise; Annoyance.** Noise can produce a number of social and behavioural effects as well as annoyance. These effects are often complex, subtle and indirect and many effects are assumed to result from the interaction of a number of non-auditory variables. The effect of community noise on annoyance can be evaluated by questionnaires or by assessing the disturbance of specific activities. However, it should be recognized that equal levels of different traffic and industrial noises cause different magnitudes of annoyance. This is because annoyance in populations varies not only with the characteristics of the noise, including the noise source, but also depends to a large degree on many non-acoustical factors of a social, psychological, or economic nature. The correlation between noise exposure and general annoyance is much higher at group level than at individual level. Noise above 80 dB(A) may also reduce helping behaviour and increase aggressive behaviour. There is particular concern that high-level continuous noise exposures may increase the susceptibility of schoolchildren to feelings of helplessness.

Stronger reactions have been observed when noise is accompanied by vibrations and contains low-frequency components, or when the noise contains impulses, such as with shooting noise. Temporary, stronger reactions occur when the noise exposure increases over time, compared to a constant noise exposure. In most cases, LAeq,24h and Ldn are acceptable approximations of noise exposure related to annoyance. However, there is growing concern that all the component parameters should be individually assessed in noise exposure investigations, at least in the complex cases. There is no consensus on a model for total annoyance due to a combination of environmental noise sources.

**Combined Effects on Health of Noise from Mixed Sources.** Many acoustical environments consist of sounds from more than one source, i.e. there are mixed sources, and some combinations of effects are common. For example, noise may interfere with speech in the day and create sleep disturbance at night. These conditions certainly apply to residential areas heavily polluted with noise. Therefore, it is important that the total adverse health load of noise be considered over 24 hours, and that the precautionary principle for sustainable development be applied.

**Vulnerable Subgroups.** Vulnerable subgroups of the general population should be considered when recommending noise protection or noise regulations. The types of noise effects, specific environments and specific lifestyles are all factors that should be addressed for these subgroups. Examples of vulnerable subgroups are: people with particular diseases or medical problems (e.g. high blood pressure); people in hospitals or rehabilitating at home; people dealing with complex cognitive tasks; the blind; people with hearing impairment; fetuses, babies and young children; and the elderly in general. People with impaired hearing are the most adversely affected with respect to speech intelligibility. Even slight hearing impairments in the high-frequency sound range may cause problems with speech perception in a noisy environment. A majority of the population belongs to the subgroup that is vulnerable to speech interference.
4. Guideline values

In chapter 4, guideline values are given for specific health effects of noise and for specific environments.

Specific health effects.

Interference with Speech Perception. A majority of the population is susceptible to speech interference by noise and belongs to a vulnerable subgroup. Most sensitive are the elderly and persons with impaired hearing. Even slight hearing impairments in the high-frequency range may cause problems with speech perception in a noisy environment. From about 40 years of age, the ability of people to interpret difficult, spoken messages with low linguistic redundancy is impaired compared to people 20–30 years old. It has also been shown that high noise levels and long reverberation times have more adverse effects in children, who have not completed language acquisition, than in young adults.

When listening to complicated messages (at school, foreign languages, telephone conversation) the signal-to-noise ratio should be at least 15 dB with a voice level of 50 dB(A). This sound level corresponds on average to a casual voice level in both women and men at 1 m distance. Consequently, for clear speech perception the background noise level should not exceed 35 dB(A). In classrooms or conference rooms, where speech perception is of paramount importance, or for sensitive groups, background noise levels should be as low as possible. Reverberation times below 1 s are also necessary for good speech intelligibility in smaller rooms. For sensitive groups, such as the elderly, a reverberation time below 0.6 s is desirable for adequate speech intelligibility even in a quiet environment.

Hearing Impairment. Noise that gives rise to hearing impairment is by no means restricted to occupational situations. High noise levels can also occur in open air concerts, discotheques, motor sports, shooting ranges, in dwellings from loudspeakers, or from leisure activities. Other important sources of loud noise are headphones, as well as toys and fireworks which can emit impulse noise. The ISO standard 1999 gives a method for estimating noise-induced hearing impairment in populations exposed to all types of noise (continuous, intermittent, impulse) during working hours. However, the evidence strongly suggests that this method should also be used to calculate hearing impairment due to noise exposure from environmental and leisure time activities. The ISO standard 1999 implies that long-term exposure to L$_{A_{eq},24h}$ noise levels of up to 70 dB(A) will not result in hearing impairment. To avoid hearing loss from impulse noise exposure, peak sound pressures should never exceed 140 dB for adults, and 120 dB for children.

Sleep Disturbance. Measurable effects of noise on sleep begin at L$_{A_{eq}}$ levels of about 30 dB. However, the more intense the background noise, the more disturbing is its effect on sleep. Sensitive groups mainly include the elderly, shift workers, people with physical or mental disorders and other individuals who have difficulty sleeping.

Sleep disturbance from intermittent noise events increases with the maximum noise level. Even if the total equivalent noise level is fairly low, a small number of noise events with a high maximum sound pressure level will affect sleep. Therefore, to avoid sleep disturbance, guidelines for community noise should be expressed in terms of the equivalent sound level of the
noise, as well as in terms of maximum noise levels and the number of noise events. It should be noted that low-frequency noise, for example, from ventilation systems, can disturb rest and sleep even at low sound pressure levels.

When noise is continuous, the equivalent sound pressure level should not exceed 30 dB(A) indoors, if negative effects on sleep are to be avoided. For noise with a large proportion of low-frequency sound a still lower guideline value is recommended. When the background noise is low, noise exceeding 45 dB LAmax should be limited, if possible, and for sensitive persons an even lower limit is preferred. Noise mitigation targeted to the first part of the night is believed to be an effective means for helping people fall asleep. It should be noted that the adverse effect of noise partly depends on the nature of the source. A special situation is for newborns in incubators, for which the noise can cause sleep disturbance and other health effects.

Reading Acquisition. Chronic exposure to noise during early childhood appears to impair reading acquisition and reduces motivational capabilities. Evidence indicates that the longer the exposure, the greater the damage. Of recent concern are the concomitant psychophysiological changes (blood pressure and stress hormone levels). There is insufficient information on these effects to set specific guideline values. It is clear, however, that daycare centres and schools should not be located near major noise sources, such as highways, airports, and industrial sites.

Annoyance. The capacity of a noise to induce annoyance depends upon its physical characteristics, including the sound pressure level, spectral characteristics and variations of these properties with time. During daytime, few people are highly annoyed at L.A eq levels below 55 dB(A), and few are moderately annoyed at L.A eq levels below 50 dB(A). Sound levels during the evening and night should be 5–10 dB lower than during the day. Noise with low-frequency components require lower guideline values. For intermittent noise, it is emphasized that it is necessary to take into account both the maximum sound pressure level and the number of noise events. Guidelines or noise abatement measures should also take into account residential outdoor activities.

Social Behaviour. The effects of environmental noise may be evaluated by assessing its interference with social behavior and other activities. For many community noises, interference with rest/recreation/watching television seem to be the most important effects. There is fairly consistent evidence that noise above 80 dB(A) causes reduced helping behavior, and that loud noise also increases aggressive behavior in individuals predisposed to aggressiveness. In schoolchildren, there is also concern that high levels of chronic noise contribute to feelings of helplessness. Guidelines on this issue, together with cardiovascular and mental effects, must await further research.

Specific environments.

A noise measure based only on energy summation and expressed as the conventional equivalent measure, L.A eq, is not enough to characterize most noise environments. It is equally important to measure the maximum values of noise fluctuations, preferably combined with a measure of the number of noise events. If the noise includes a large proportion of low-frequency components, still lower values than the guideline values below will be needed. When prominent low-frequency components are present, noise measures based on A-weighting are inappropriate. The difference between dB(C) and dB(A) will give crude information about the presence of low-frequency components in noise, but if the difference is more than 10 dB, it is recommended that
a frequency analysis of the noise be performed. It should be noted that a large proportion of low-frequency components in noise may increase considerably the adverse effects on health.

**In Dwellings.** The effects of noise in dwellings, typically, are sleep disturbance, annoyance and speech interference. For bedrooms the critical effect is sleep disturbance. Indoor guideline values for bedrooms are 30 dB L\textit{A}eq for continuous noise and 45 dB L\textit{A}max for single sound events. Lower noise levels may be disturbing depending on the nature of the noise source. At night-time, outside sound levels about 1 metre from facades of living spaces should not exceed 45 dB L\textit{A}eq, so that people may sleep with bedroom windows open. This value was obtained by assuming that the noise reduction from outside to inside with the window open is 15 dB. To enable casual conversation indoors during daytime, the sound level of interfering noise should not exceed 35 dB L\textit{A}eq. The maximum sound pressure level should be measured with the sound pressure meter set at “Fast”.

To protect the majority of people from being seriously annoyed during the daytime, the outdoor sound level from steady, continuous noise should not exceed 55 dB L\textit{A}eq on balconies, terraces and in outdoor living areas. To protect the majority of people from being moderately annoyed during the daytime, the outdoor sound level should not exceed 50 dB L\textit{A}eq. Where it is practical and feasible, the lower outdoor sound level should be considered the maximum desirable sound level for new development.

**In Schools and Preschools.** For schools, the critical effects of noise are speech interference, disturbance of information extraction (e.g. comprehension and reading acquisition), message communication and annoyance. To be able to hear and understand spoken messages in class rooms, the background sound level should not exceed 35 dB L\textit{A}eq during teaching sessions. For hearing impaired children, a still lower sound level may be needed. The reverberation time in the classroom should be about 0.6 s, and preferably lower for hearing impaired children. For assembly halls and cafeterias in school buildings, the reverberation time should be less than 1 s. For outdoor playgrounds the sound level of the noise from external sources should not exceed 55 dB L\textit{A}eq, the same value given for outdoor residential areas in daytime.

For preschools, the same critical effects and guideline values apply as for schools. In bedrooms in preschools during sleeping hours, the guideline values for bedrooms in dwellings should be used.

**In Hospitals.** For most spaces in hospitals, the critical effects are sleep disturbance, annoyance, and communication interference, including warning signals. The L\textit{A}max of sound events during the night should not exceed 40 dB(A) indoors. For ward rooms in hospitals, the guideline values indoors are 30dB L\textit{A}eq, together with 40 dB L\textit{A}max during night. During the day and evening the guideline value indoors is 30 dB L\textit{A}eq. The maximum level should be measured with the sound pressure instrument set at “Fast”.

Since patients have less ability to cope with stress, the L\textit{A}eq level should not exceed 35 dB in most rooms in which patients are being treated or observed. Attention should be given to the sound levels in intensive care units and operating theaters. Sound inside incubators may result in health problems for neonates, including sleep disturbance, and may also lead to hearing impairment. Guideline values for sound levels in incubators must await future research.

**Ceremonies, Festivals and Entertainment Events.** In many countries, there are regular ceremonies, festivals and entertainment events to celebrate life periods. Such events typically
produce loud sounds, including music and impulsive sounds. There is widespread concern about the effect of loud music and impulsive sounds on young people who frequently attend concerts, discotheques, video arcades, cinemas, amusement parks and spectator events. At these events, the sound level typically exceeds 100 dB LAeq. Such noise exposure could lead to significant hearing impairment after frequent attendances.

Noise exposure for employees of these venues should be controlled by established occupational standards; and at the very least, the same standards should apply to the patrons of these premises. Patrons should not be exposed to sound levels greater than 100 dB LAeq during a four-hour period more than four times per year. To avoid acute hearing impairment the LAmx should always be below 110 dB.

**Headphones.** To avoid hearing impairment from music played back in headphones, in both adults and children, the equivalent sound level over 24 hours should not exceed 70 dB(A). This implies that for a daily one hour exposure the LAeq level should not exceed 85 dB(A). To avoid acute hearing impairment LAmx should always be below 110 dB(A). The exposures are expressed in free-field equivalent sound level.

**Toys, Fireworks and Firearms.** To avoid acute mechanical damage to the inner ear from impulsive sounds from toys, fireworks and firearms, adults should never be exposed to more than 140 dB (lin) peak sound pressure level. To account for the vulnerability in children when playing, the peak sound pressure produced by toys should not exceed 120 dB (lin), measured close to the ears (100 mm). To avoid acute hearing impairment LAmx should always be below 110 dB(A).

**Parkland and Conservation Areas.** Existing large quiet outdoor areas should be preserved and the signal-to-noise ratio kept low.

Table 1 presents the WHO guideline values arranged according to specific environments and critical health effects. The guideline values consider all identified adverse health effects for the specific environment. An adverse effect of noise refers to any temporary or long-term impairment of physical, psychological or social functioning that is associated with noise exposure. Specific noise limits have been set for each health effect, using the lowest noise level that produces an adverse health effect (i.e. the critical health effect). Although the guideline values refer to sound levels impacting the most exposed receiver at the listed environments, they are applicable to the general population. The time base for LAeq for “daytime” and “night-time” is 12–16 hours and 8 hours, respectively. No time base is given for evenings, but typically the guideline value should be 5–10 dB lower than in the daytime. Other time bases are recommended for schools, preschools and playgrounds, depending on activity.

It is not enough to characterize the noise environment in terms of noise measures or indices based only on energy summation (e.g., LAeq), because different critical health effects require different descriptions. It is equally important to display the maximum values of the noise fluctuations, preferably combined with a measure of the number of noise events. A separate characterization of night-time noise exposures is also necessary. For indoor environments, reverberation time is also an important factor for things such as speech intelligibility. If the noise includes a large proportion of low-frequency components, still lower guideline values should be applied. Supplementary to the guideline values given in Table 1, precautions should be taken for vulnerable groups and for noise of certain character (e.g. low-frequency components, low background noise).
Table 1: Guideline values for community noise in specific environments.

<table>
<thead>
<tr>
<th>Specific environment</th>
<th>Critical health effect(s)</th>
<th>( L_{\text{Aeq}} ) [dB(A)]</th>
<th>Time base [hours]</th>
<th>( L_{\text{Amax}} ) fast [dB]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outdoor living area</td>
<td>Serious annoyance, daytime and evening Moderate annoyance, daytime and evening</td>
<td>55 50</td>
<td>16 16</td>
<td>- -</td>
</tr>
<tr>
<td>Dwelling, indoors</td>
<td>Speech intelligibility &amp; moderate annoyance, daytime &amp; evening Sleep disturbance, night-time</td>
<td>35 30</td>
<td>16 8</td>
<td>45 -</td>
</tr>
<tr>
<td>Inside bedrooms</td>
<td>Sleep disturbance, window open (outdoor values)</td>
<td>45</td>
<td>8</td>
<td>60 -</td>
</tr>
<tr>
<td>School class rooms &amp; pre-schools, indoors</td>
<td>Speech intelligibility, disturbance of information extraction, message communication</td>
<td>35</td>
<td>during class</td>
<td>- -</td>
</tr>
<tr>
<td>Pre-school bedrooms, indoor</td>
<td>Sleep disturbance</td>
<td>30</td>
<td>sleeping-time</td>
<td>45 -</td>
</tr>
<tr>
<td>School, playground outdoor</td>
<td>Annoyance (external source)</td>
<td>55</td>
<td>during play</td>
<td>- -</td>
</tr>
<tr>
<td>Hospital, ward rooms, indoors</td>
<td>Sleep disturbance, night-time Sleep disturbance, daytime and evenings</td>
<td>30 30</td>
<td>8 16</td>
<td>40 -</td>
</tr>
<tr>
<td>Hospitals, treatment rooms, indoors</td>
<td>Interference with rest and recovery</td>
<td>#1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Industrial, commercial shopping and traffic areas, indoors and outdoors</td>
<td>Hearing impairment</td>
<td>70</td>
<td>24</td>
<td>110</td>
</tr>
<tr>
<td>Ceremonies, festivals and entertainment events</td>
<td>Hearing impairment (patrons:&lt;5 times/year)</td>
<td>100</td>
<td>4</td>
<td>110</td>
</tr>
<tr>
<td>Public addresses, indoors and outdoors</td>
<td>Hearing impairment</td>
<td>85</td>
<td>1</td>
<td>110</td>
</tr>
<tr>
<td>Music and other sounds through headphones/earphones</td>
<td>Hearing impairment (free-field value)</td>
<td>85 #4</td>
<td>1</td>
<td>110</td>
</tr>
<tr>
<td>Impulse sounds from toys, fireworks and firearms</td>
<td>Hearing impairment (adults) Hearing impairment (children)</td>
<td>- -</td>
<td>-</td>
<td>140 120 #2</td>
</tr>
<tr>
<td>Outdoors in parkland and conservations areas</td>
<td>Disruption of tranquillity</td>
<td>#3</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>

#1: As low as possible.
#2: Peak sound pressure (not LAF, max) measured 100 mm from the ear.
#3: Existing quiet outdoor areas should be preserved and the ratio of intruding noise to natural background sound should be kept low.

#4: Under headphones, adapted to free-field values.

5. Noise Management

Chapter 5 is devoted to noise management with discussions on: strategies and priorities in managing indoor noise levels; noise policies and legislation; the impact of environmental noise; and on the enforcement of regulatory standards.

The fundamental goals of noise management are to develop criteria for deriving safe noise exposure levels and to promote noise assessment and control as part of environmental health programmes. These basic goals should guide both international and national policies for noise management. The United Nation’s Agenda 21 supports a number of environmental management principles on which government policies, including noise management policies, can be based: the principle of precaution; the “polluter pays” principle; and noise prevention. In all cases, noise should be reduced to the lowest level achievable in the particular situation. When there is a reasonable possibility that the public health will be endangered, even though scientific proof may be lacking, action should be taken to protect the public health, without awaiting the full scientific proof. The full costs associated with noise pollution (including monitoring, management, lowering levels and supervision) should be met by those responsible for the source of noise. Action should be taken where possible to reduce noise at the source.

A legal framework is needed to provide a context for noise management. National noise standards can usually be based on a consideration of international guidelines, such as these Guidelines for Community Noise, as well as national criteria documents, which consider dose-response relationships for the effects of noise on human health. National standards take into account the technological, social, economic and political factors within the country. A staged program of noise abatement should also be implemented to achieve the optimum health protection levels over the long term.

Other components of a noise management plan include: noise level monitoring; noise exposure mapping; exposure modeling; noise control approaches (such as mitigation and precautionary measures); and evaluation of control options. Many of the problems associated with high noise levels can be prevented at low cost, if governments develop and implement an integrated strategy for the indoor environment, in concert with all social and economic partners. Governments should establish a "National Plan for a Sustainable Noise Indoor Environment" that applies both to new construction as well as to existing buildings.

The actual priorities in rational noise management will differ for each country. Priority setting in noise management refers to prioritizing the health risks to be avoided and concentrating on the most important sources of noise. Different countries have adopted a range of approaches to noise control, using different policies and regulations. A number of these are outlined in chapter 5 and Appendix 2, as examples. It is evident that noise emission standards have proven insufficient and that the trends in noise pollution are unsustainable.
The concept of environmental an environmental noise impact analysis is central to the philosophy of managing environmental noise. Such an analysis should be required before implementing any project that would significantly increase the level of environmental noise in a community (typically, greater than a 5 dB increase). The analysis should include: a baseline description of the existing noise environment; the expected level of noise from the new source; an assessment of the adverse health effects; an estimation of the population at risk; the calculation of exposure-response relationships; an assessment of risks and their acceptability; and a cost-benefit analysis.

Noise management should:
1. Start monitoring human exposures to noise.
2. Have health control require mitigation of noise immissions, and not just of noise source emissions. The following should be taken into consideration:
   - specific environments such as schools, playgrounds, homes, hospitals.
   - environments with multiple noise sources, or which may amplify the effects of noise.
   - sensitive time periods such as evenings, nights and holidays.
   - groups at high risk, such as children and the hearing impaired.
3. Consider the noise consequences when planning transport systems and land use.
4. Introduce surveillance systems for noise-related adverse health effects.
5. Assess the effectiveness of noise policies in reducing adverse health effects and exposure, and in improving supportive "soundscapes".
6. Adopt these Guidelines for Community Noise as intermediary targets for improving human health.
7. Adopt precautionary actions for a sustainable development of the acoustical environments.

Conclusions and recommendations

In chapter 6 are discussed: the implementation of the guidelines; further WHO work on noise; and research needs are recommended.

Implementation. For implementation of the guidelines it is recommended that:

- Governments should protection the population from community noise and consider it an integral part of their policy of environmental protection.
- Governments should consider implementing action plans with short-term, medium-term and long-term objectives for reducing noise levels.
- Governments should adopt the Health Guidelines for Community Noise values as targets to be achieved in the long-term.
- Governments should include noise as an important public health issue in environmental impact assessments.
- Legislation should be put in place to allow for the reduction of sound levels.
- Existing legislation should be enforced.
- Municipalities should develop low noise implementation plans.
• Cost-effectiveness and cost-benefit analyses should be considered potential instruments for meaningful management decisions.
• Governments should support more policy-relevant research.

Future Work. The Expert Task Force worked out several suggestions for future work for the WHO in the field of community noise. WHO should:
• Provide leadership and technical direction in defining future noise research priorities.
• Organize workshops on how to apply the guidelines.
• Provide leadership and coordinate international efforts to develop techniques for designing supportive sound environments (e.g. "soundscapes").
• Provide leadership for programs to assess the effectiveness of health-related noise policies and regulations.
• Provide leadership and technical direction for the development of sound methodologies for environmental and health impact plans.
• Encourage further investigation into using noise exposure as an indicator of environmental deterioration (e.g. black spots in cities).
• Provide leadership and technical support, and advise developing countries to facilitate development of noise policies and noise management.

Research and Development. A major step forward in raising the awareness of both the public and of decision makers is the recommendation to concentrate more research and development on variables which have monetary consequences. This means that research should consider not only dose-response relationships between sound levels, but also politically relevant variables, such as noise-induced social handicap; reduced productivity; decreased performance in learning; workplace and school absenteeism; increased drug use; and accidents.

In Appendices 1–6 are given: bibliographic references; examples of regional noise situations (African Region, American Region, Eastern Mediterranean Region, South East Asian Region, Western Pacific Region); a glossary; a list of acronyms; and a list of participants.
1. Introduction

Community noise (also called environmental noise, residential noise or domestic noise) is defined as noise emitted from all sources, except noise at the industrial workplace. Main sources of community noise include road, rail and air traffic, industries, construction and public work, and the neighbourhood. Typical neighbourhood noise comes from premises and installations related to the catering trade (restaurant, cafeterias, discotheques, etc.); from live or recorded music; from sporting events including motor sports; from playgrounds and car parks; and from domestic animals such as barking dogs. The main indoor sources are ventilation systems, office machines, home appliances and neighbours. Although many countries have regulations on community noise from road, rail and air traffic, and from construction and industrial plants, few have regulations on neighbourhood noise. This is probably due to the lack of methods to define and measure it, and to the difficulty of controlling it. In developed countries, too, monitoring of compliance with, and enforcement of, noise regulations are weak for lower levels of urban noise that correspond to occupationally controlled levels (>85 dB LAeq,8h; Frank 1998). Recommended guideline values based on the health effects of noise, other than occupationally-induced effects, are often not taken into account.

The extent of the community noise problem is large. In the European Union about 40% of the population is exposed to road traffic noise with an equivalent sound pressure level exceeding 55 dBA daytime; and 20% is exposed to levels exceeding 65 dBA (Lambert & Vallet 1994). When all transportation noise is considered, about half of all European Union citizens live in zones that do not ensure acoustical comfort to residents. At night, it is estimated that more than 30% is exposed to equivalent sound pressure levels exceeding 55 dBA, which are disturbing to sleep. The noise pollution problem is also severe in the cities of developing countries and is caused mainly by traffic. Data collected alongside densely traveled roads were found to have equivalent sound pressure levels for 24 hours of 75–80 dBA (e.g. National Environment Board Thailand 1990; Mage & Walsh 1998).

(a) In contrast to many other environmental problems, noise pollution continues to grow, accompanied by an increasing number of complaints from affected individuals. Most people are typically exposed to several noise sources, with road traffic noise being a dominant source (OECD-ECMT 1995). Population growth, urbanization and to a large extent technological development are the main driving forces, and future enlargements of highway systems, international airports and railway systems will only increase the noise problem. Viewed globally, the growth in urban environmental noise pollution is unsustainable, because it involves not simply the direct and cumulative adverse effects on health. It also adversely affects future generations by degrading residential, social and learning environments, with corresponding economical losses (Berglund 1998). Thus, noise is not simply a local problem, but a global issue that affects everyone (Lang 1999; Sandberg 1999) and calls for precautionary action in any environmental planning situation.

The objective of the World Health Organization (WHO) is the attainment by all peoples of the highest possible level of health. As the first principle of the WHO Constitution the definition of
'health' is given as: "A state of complete physical, mental and social well-being and not merely the absence of disease or infirmity". This broad definition of health embraces the concept of well-being and, thereby, renders noise impacts such as population annoyance, interference with communication, and impaired task performance as 'health' issues. In 1992, a WHO Task Force also identified the following specific health effects for the general population that may result from community noise: interference with communication; annoyance responses; effects on sleep, and on the cardiovascular and psychophysiological systems; effects on performance, productivity, and social behavior; and noise-induced hearing impairment (WHO 1993; Berglund & Lindvall 1995; cf. WHO 1980). Hearing damage is expected to result from both occupational and environmental noise, especially in developing countries, where compliance with noise regulation is known to be weak (Smith 1998).

Noise is likely to continue as a major issue well into the next century, both in developed and in developing countries. Therefore, strategic action is urgently required, including continued noise control at the source and in local areas. Most importantly, joint efforts among countries are necessary at a system level, in regard to the access and use of land, airspace and seawaters, and in regard to the various modes of transportation. Certainly, mankind would benefit from societal reorganization towards healthy transport. To understand noise we must understand the different types of noise and how we measure it, where noise comes from and the effects of noise on human beings. Furthermore, noise mitigation, including noise management, has to be actively introduced and in each case the policy implications have to be evaluated for efficiency.

This document is organized as follows. In Chapter 2 noise sources and measurement are discussed, including the basic aspects of source characteristics, sound propagation and transmission. In Chapter 3 the adverse health effects of noise are characterized. These include noise-induced hearing impairment, interference with speech communication, sleep disturbance, cardiovascular and physiological effects, mental health effects, performance effects, and annoyance reactions. This chapter is rounded out by a consideration of combined noise sources and their effects, and a discussion of vulnerable groups. In Chapter 4 the Guideline values are presented. Chapter 5 is devoted to noise management. Included are discussions of: strategies and priorities in the management of indoor noise levels; noise policies and legislation; environmental noise impact; and enforcement of regulatory standards. In Chapter 6 implementation of the WHO Guidelines is discussed, as well as future WHO work on noise and its research needs. In Appendices 1–6 are given: bibliographic references; examples of regional noise situations (African Region, American Region, Eastern Mediterranean Region, South East Asian Region, Western Pacific Region); a glossary; a list of acronyms; and a list of participants.
2. Noise sources and their measurement

2.1. Basic Aspects of Acoustical Measurements

Most environmental noises can be approximately described by one of several simple measures. They are all derived from overall sound pressure levels, the variation of these levels with time and the frequency of the sounds. Ford (1987) gives a more extensive review of various environmental noise measures. Technical definitions are found in the glossary in Appendix 3.

2.1.1. Sound pressure level

The sound pressure level is a measure of the air vibrations that make up sound. All measured sound pressures are referenced to a standard pressure that corresponds roughly to the threshold of hearing at 1 000 Hz. Thus, the sound pressure level indicates how much greater the measured sound is than this threshold of hearing. Because the human ear can detect a wide range of sound pressure levels (10–102 Pascal (Pa)), they are measured on a logarithmic scale with units of decibels (dB). A more technical definition of sound pressure level is found in the glossary.

The sound pressure levels of most noises vary with time. Consequently, in calculating some measures of noise, the instantaneous pressure fluctuations must be integrated over some time interval. To approximate the integration time of our hearing system, sound pressure meters have a standard Fast response time, which corresponds to a time constant of 0.125 s. Thus, all measurements of sound pressure levels and their variation over time should be made using the Fast response time, to provide sound pressure measurements more representative of human hearing. Sound pressure meters may also include a Slow response time with a time constant of 1 s, but its sole purpose is that one can more easily estimate the average value of rapidly fluctuating levels. Many modern meters can integrate sound pressures over specified periods and provide average values. It is not recommended that the Slow response time be used when integrating sound pressure meters are available.

Because sound pressure levels are measured on a logarithmic scale they cannot be added or averaged arithmetically. For example, adding two sounds of equal pressure levels results in a total pressure level that is only 3 dB greater than each individual sound pressure level. Consequently, when two sounds are combined the resulting sound pressure level will be significantly greater than the individual sound levels only if the two sounds have similar pressure levels. Details for combining sound pressure levels are given in Appendix 2.

2.1.2. Frequency and frequency weighting

The unit of frequency is the Hertz (Hz), and it refers to the number of vibrations per second of the air in which the sound is propagating. For tonal sounds, frequency is associated with the perception of pitch. For example, orchestras often tune to the frequency of 440 Hz. Most environmental sounds, however, are made up of a complex mix of many different frequencies. They may or may not have discrete frequency components superimposed on noise with a broad
frequency spectrum (i.e. sound with a broad range of frequencies). The audible frequency range is normally considered to range from 20–20 000 Hz. Below 20 Hz we hear individual sound pulses rather than recognizable tones. Hearing sensitivity to higher frequencies decreases with age and exposure to noise. Thus, 20 000 Hz represents an upper limit of audibility for younger listeners with unimpaired hearing.

Our hearing systems are not equally sensitive to all sound frequencies (ISO 1987a). Thus, not all frequencies are perceived as being equally loud at the same sound pressure level, and when calculating overall environmental noise ratings it is necessary to consider sounds at some frequencies as more important than those at other frequencies. Detailed frequency analyses are commonly performed with standard sets of octave or 1/3 octave bandwidth filters. Alternatively, Fast Fourier Transform techniques or other types of filters can be used to determine the relative strengths of the various frequency components making up a particular environmental noise.

Frequency weighting networks provide a simpler approach for weighting the importance of different frequency components in one single number rating. The A-weighting is most commonly used and is intended to approximate the frequency response of our hearing system. It weights lower frequencies as less important than mid- and higher-frequency sounds. C-weighting is also quite common and is a nearly flat frequency response with the extreme high and low frequencies attenuated. When no frequency analysis is possible, the difference between A-weighted and C-weighted levels gives an indication of the amount of low frequency content in the measured noise. When the sound has an obvious tonal content, a correction to account for the additional annoyance may be used (ISO 1987b).

2.1.3. Equivalent continuous sound pressure level

According to the equal energy principle, the effect of a combination of noise events is related to the combined sound energy of those events. Thus, measures such as the equivalent continuous sound pressure level (L\text{Aeq,T}) sum up the total energy over some time period (T) and give a level equivalent to the average sound energy over that period. Such average levels are usually based on integration of A-weighted levels. Thus L\text{Aeq,T} is the average energy equivalent level of the A-weighted sound over a period T.

2.1.4. Individual noise events

It is often desired to measure the maximum level (L\text{Amax}) of individual noise events. For cases such as the noise from a single passing vehicle, L\text{Amax} values should be measured using the Fast response time because it will give a good correlation with the integration of loudness by our hearing system. However, for very short-duration impulsive sounds it is often desirable to measure the instantaneous peak amplitude to assess potential hearing-damage risk. If actual instantaneous pressure cannot be determined, then a time-integrated 'peak' level with a time constant of no more than 0.05 ms should be used (ISO 1987b). Such peak readings are often made using the C- (or linear) frequency weightings.

Alternatively, discrete sound events can be evaluated in terms of their A-weighted sound exposure level (SEL, for definition see appendix 5). The total amount of sound energy in a
particular event is assessed by the SEL. One can add up the SEL values of individual events to calculate a LAeq,T over some time period, T, of interest. In some cases the SEL may provide more consistent evaluations of individual noise events because they are derived from the complete history of the event and not just one maximum value. However, A-weighted SEL measurements have been shown to be inadequate for assessing the (perceived) loudness of complex impulsive sounds, such as those from large and small weapons (Berglund et al. 1986). In contrast, C-weighted SEL values have been found useful for rating impulsive sounds such as gun shots (Vos 1996; Buchta 1996; ISO 1987b).

2.1.5. Choice of noise measure

LAeq,T should be used to measure continuing sounds such as road traffic noise, many types of industrial noises and noise from ventilation systems in buildings. When there are distinct events to the noise such as with aircraft or railway noise, measures of the individual events should be obtained (using, for example, LAmx or SEL), in addition to LAeq,T measurements.

In the past, time-varying environmental sound levels have also been described in terms of percentile levels. These are derived from a statistical distribution of measured sound levels over some period. For example, L10 is the A-weighted level exceeded 10% of the time. L10 values have been widely used to measure road-traffic noise, but they are usually found to be highly correlated measures of the individual events, as are LAmx and SEL. L90 or L95 can be used as a measure of the general background sound pressure level that excludes the potentially confounding influence of particular local noise events.

2.1.6. Sound and noise

Physically, there is no distinction between sound and noise: sound is a sensory perception evoked by physiological processes in the auditory brain. The complex pattern of sound waves is perceptually classified as "Gestalts" and are labeled as noise, music, speech, etc. Consequently, it is not possible to define noise exclusively on the basis of the physical parameters of sound. Instead, it is common practice to define noise simply as unwanted sound. However, in some situations noise may adversely affect health in the form of acoustical energy.

2.2. Sources of Noise

This section describes various sources of noise that can affect a community. Namely, noise from industry, transportation, and from residential and leisure areas. It should be noted that equal values of LAeq,T for different sources do not always imply the same expected effect.

2.2.1. Industrial noise

Mechanized industry creates serious noise problems. It is responsible for intense noise indoors as well as outdoors. This noise is due to machinery of all kinds and often increases with the power of the machines. Sound generation mechanisms of machinery are reasonably well understood. The noise may contain predominantly low or high frequencies, tonal components,
be impulsive or have unpleasant and disruptive temporal sound patterns. Rotating and reciprocating machines generate sound that includes tonal components; and air-moving equipment tends also to generate noise with a wide frequency range. The high sound pressure levels are caused by components or gas flows that move at high speed (for example, fans, steam pressure relief valves), or by operations involving mechanical impacts (for example, stamping, riveting, road breaking). Machinery should preferably be silenced at the source.

Noise from fixed installations, such as factories or construction sites, heat pumps and ventilation systems on roofs, typically affect nearby communities. Reductions may be achieved by encouraging quieter equipment or by zoning of land into industrial and residential areas. Requirements for passive (sound insulating enclosures) and active noise control, or restriction of operation time, may also be effective.

2.2.2. Transportation noise

Transportation noise is the main source of environmental noise pollution, including road traffic, rail traffic and air traffic. As a general rule, larger and heavier vehicles emit more noise than smaller and lighter vehicles. Exceptions would include: helicopters and 2- and 3-wheeled road vehicles.

The noise of road vehicles is mainly generated from the engine and from frictional contact between the vehicle and the ground and air. In general, road-contact noise exceeds engine noise at speeds higher than 60 km/h. The physical principle responsible for generating noise from tire-road contact is less well understood. The sound pressure level from traffic can be predicted from the traffic flow rate, the speed of the vehicles, the proportion of heavy vehicles, and the nature of the road surface. Special problems can arise in areas where the traffic movements involve a change in engine speed and power, such as at traffic lights, hills, and intersecting roads; or where topography, meteorological conditions and low background levels are unfavourable (for example, mountain areas).

Railway noise depends primarily on the speed of the train, but variations are present depending upon the type of engine, wagons, and rails and their foundations, as well as the roughness of wheels and rails. Small radius curves in the track, such as may occur for urban trains, can lead to very high levels of high-frequency sound referred to as wheel squeal. Noise can be generated in stations because of running engines, whistles and loudspeakers, and in marshaling yards because of shunting operations. The introduction of high-speed trains has created special noise problems with sudden, but not impulsive, rises in noise. At speeds greater than 250 km/h, the proportion of high-frequency sound energy increases and the sound can be perceived as similar to that of overflying jet aircraft. Special problems can arise in areas close to tunnels, in valleys or in areas where the ground conditions help generate vibrations. The long-distance propagation of noise from high-speed trains will constitute a problem in the future if otherwise environment-friendly railway systems are expanded.

Aircraft operations generate substantial noise in the vicinity of both commercial and military airports. Aircraft takeoffs are known to produce intense noise, including vibration and rattle. The landings produce substantial noise in long low-altitude flight corridors. The noise is
produced by the landing gear and automatic power regulation, and also when reverse thrust is applied, all for safety reasons. In general, larger and heavier aircraft produce more noise than lighter aircraft. The main mechanism of noise generation in the early turbojet-powered aircraft was the turbulence created by the jet exhaust mixing with the surrounding air. This noise source has been significantly reduced in modern high by-pass ratio turbo-fan engines that surround the high-velocity jet exhaust with lower velocity airflow generated by the fan. The fan itself can be a significant noise source, particularly during landing and taxiing operations. Multi-bladed turbo-prop engines can produce relatively high levels of tonal noise. The sound pressure level from aircraft is, typically, predicted from the number of aircraft, the types of airplanes, their flight paths, the proportions of takeoffs and landings and the atmospheric conditions. Severe noise problems may arise at airports hosting many helicopters or smaller aircraft used for private business, flying training and leisure purposes. Special noise problems may also arise inside airplanes because of vibration. The noise emission from future superjets is unknown.

A sonic boom consists of a shock wave in the air, generated by an aircraft when it flies at a speed slightly greater than the local speed of sound. An aircraft in supersonic flight trails a sonic boom that can be heard up to 50 km on either side of its ground track, depending upon the flight altitude and the size of the aircraft (Warren 1972). A sonic boom can be heard as a loud double-boom sound. At high intensity it can damage property.

Noise from military airfields may present particular problems compared to civil airports (von Gierke & Harris 1987). For example, when used for night-time flying, for training interrupted landings and takeoffs (so-called touch-and-go), or for low-altitude flying. In certain instances, including wars, specific military activities introduce other intense noise pollution from heavy vehicles (tanks), helicopters, and small and large fire-arms.

2.2.3. Construction noise and building services noise

Building construction and excavation work can cause considerable noise emissions. A variety of sounds come from cranes, cement mixers, welding, hammering, boring and other work processes. Construction equipment is often poorly silenced and maintained, and building operations are sometimes carried out without considering the environmental noise consequences. Street services such as garbage disposal and street cleaning can also cause considerable disturbance if carried out at sensitive times of day. Ventilation and air conditioning plants and ducts, heat pumps, plumbing systems, and lifts (elevators), for example, can compromise the internal acoustical environment and upset nearby residents.

2.2.4. Domestic noise and noise from leisure activities

In residential areas, noise may stem from mechanical devices (e.g. heat pumps, ventilation systems and traffic), as well as voices, music and other kinds of sounds generated by neighbours (e.g. lawn mowers, vacuum cleaners and other household equipment, music reproduction and noisy parties). Aberrant social behavior is a well-recognized noise problem in multifamily dwellings, as well as at sites for entertainment (e.g. sports and music events). Due to predominantly low-frequency components, noise from ventilation systems in residential buildings may also cause considerable concern even at low and moderate sound pressure levels.
The use of powered machines in leisure activities is increasing. For example, motor racing, off-road vehicles, motorboats, water skiing, snowmobiles etc., and these contribute significantly to loud noises in previously quiet areas. Shooting activities not only have considerable potential for disturbing nearby residents, but can also damage the hearing of those taking part. Even tennis playing, church bell ringing and other religious activities can lead to noise complaints.

Some types of indoor concerts and discotheques can produce extremely high sound pressure levels. Associated noise problems outdoors result from customers arriving and leaving. Outdoor concerts, fireworks and various types of festivals can also produce intense noise. The general problem of access to festivals and leisure activity sites often adds to road traffic noise problems. Severe hearing impairment may also arise from intense sound produced as music in headphones or from children’s toys.

2.3. The Complexity of Noise and Its Practical Implications

2.3.1. The problem

One must consider many different characteristics to describe environmental noises completely. We can consider the sound pressure level of the noise and how this level varies over a variety of periods, ranging from minutes or seconds to seasonal variations over several months. Where sound pressure levels vary quite substantially and rapidly, such as in the case of low-level jet aircraft, one might also want to consider the rate of change of sound pressure levels (Berry 1995; Kerry et al. 1997). At the same time, the frequency content of each noise will also determine its effect on people, as will the number of events when there are relatively small numbers of discrete noisy events. Combinations of these characteristics determine how each type of environmental noise affects people. These effects may be annoyance, sleep disturbance, speech interference, increased stress, hearing impairment or other health-related effects.

Thus, in total there is a very complex multidimensional relationship between the various characteristics of the environmental noise and the effects it has on people. Unfortunately, we do not completely understand all of the complex links between noise characteristics and the resulting effects on people. Thus, current practice is to reduce the assessment of environmental noise to a small number of quite simple quantities that are known to be reasonably well related to the effects of noise on people (LAEq,T for continuing sounds and LAm and SEL where there are a small number of distinct noise events). These simple measures have the distinct advantage that they are relatively easy and inexpensive to obtain and hence are more likely to be widely adopted. On the other hand, they may ignore some details of the noise characteristics that relate to particular types of effects on people.

2.3.2. Time variation

There is evidence that the pattern of noise variation with time relates to annoyance (Berglund et al. 1976). It has been suggested that the equal-energy principle is a simple concept for obtaining a measure representative of the annoyance of a number of noise events. For example, the LAeq,T of the noise from a busy road may be a good indicator of the annoyance this noise may
cause for nearby residents. However, such a measure may not be very useful for predicting the disturbance to sleep of a small number of very noisy aircraft fly-overs. The disturbance caused by small numbers of such discrete events is usually better related to maximum sound pressure levels and the number of events.

While using L_{Aeq,T} measures is the generally accepted approach, it is still important to appreciate the limitations and errors that may occur. For example, some years ago measures that assessed the variation of sound pressure levels with time were popular. Subsequently, these have been shown not to improve predictions of annoyance with road traffic noise (Bradley 1978). However, it is possible that time variations may contribute to explaining the very different amounts of annoyance caused by equal L_{Aeq,T} levels of road-traffic noise, train noise and aircraft noise (cf. Miedema & Vos 1998).

More regular variations of sound pressure levels with time have been found to increase the annoying aspects of the noise. For example, noises that vary periodically to create a throbbing or pulsing sensation can be more disturbing than continuous noise (Bradley 1994b). Research suggests that variations at about 4 per second are most disturbing (Zwicker 1989). Noises with very rapid onsets could also be more disturbing than indicated by their L_{Aeq,T} (Berry 1995; Kerry et al. 1997).

L_{Aeq,T} values can be calculated for various time periods and it is very important to specify this period. It is quite common to calculate L_{Aeq,T} values separately for day- and night-time periods. In combining day and night L_{Aeq,T} values it is usually assumed that people will be more sensitive to noise during the night-time period. A weighting is thus normally added to night-time L_{Aeq,T} values when calculating a combined measure for a 24 hour period. For example, day-night sound pressure measures commonly include a 10 dB night-time weighting. Other night-time weightings have been proposed, but it has been suggested that it is not possible to determine precisely an optimum value for night-time weightings from annoyance survey responses, because of the large variability in responses within groups of people (Fields 1986; see also Berglund & Lindvall 1995). Night-time weightings are intended to indicate the expected increased sensitivity to annoyance at night and do not protect people from sleep disturbance.

2.3.3. Frequency content and loudness

Noise can also be characterized by its frequency content. This can be assessed by various types of frequency analysis to determine the relative contributions of the frequency components to the total noise. The combined effects of the different frequencies on people, perceived as noise, can be approximated by simple frequency weightings. The A-weighting is now widely used to obtain an approximate, single-number rating of the combined effects of the various frequencies. The A-weighting response is a simplification of an equal-loudness contour. There is a family of these equal-loudness contours (ISO 1987a) that describe the frequency response of the hearing system for a wide range of frequencies and sound pressure levels. These equal-loudness contours can be used to determine the perceived loudness of a single frequency sound. More complicated procedures have been derived to estimate the perceived loudness of complex sounds (ISO 1975). These methods involve determining the level of the sound in critical bands and the mutual masking of these bands.
Many studies have compared the accuracy of predictions based on A-weighted levels with those based on other frequency weightings, as well as more complex measures such as loudness levels and perceived noise levels (see also Berglund & Lindvall 1995). The comparisons depend on the particular effect that is being predicted, but generally the correlation between the more complex measures and subjective scales are a little stronger. A-weighted measures have been particularly criticized as not being accurate indicators of the disturbing effects of noises with strong low-frequency components (Kjellberg et al. 1984; Persson & Björkman 1988; Broner & Leventhal 1993; Goldstein 1994). However, these differences in prediction accuracy are usually smaller than the variability of responses among groups of people (Fields 1986; see also Berglund & Lindvall 1995). Thus, in practical situations the limitations of A-weighted measures may not be so important.

In addition to equal-loudness contours, equal-noisiness contours have also been developed for calculating perceived noise levels (PNL) (Kryter 1959; Kryter 1994; see also section 2.7.2). Critics have pointed out that in addition to equal-loudness and equal-noisiness contours, we could have many other families of equal-sensation contours corresponding to other attributes of the noises (Molino 1974). There seems to be no limit to the possible complexity and number of such measures.

2.3.4. Influence of ambient noise level

A number of studies have suggested that the annoyance effect of a particular noise would depend on how much that noise exceeded the level of ambient noise. This has been shown to be true for noises that are relatively constant in level (Bradley 1993), but has not been consistently found for time-varying noises such as aircraft noise (Gjesteland et al. 1990; Fields 1998). Because at some time during an aircraft fly-over the noise almost always exceeds the ambient level, responses to this type of noise are less likely to be influenced by the level of the ambient noise.

2.3.5. Types of noise

A number of studies have concluded that equal levels of different noise types lead to different annoyance (Hall et al. 1981; Griffiths 1983; Miedema 1993; Bradley 1994a; Miedema & Vos 1998). For example, equal L_Aeq,T levels of aircraft noise and road traffic noise will not lead to the same mean annoyance in groups of people exposed to these noises. This may indicate that the L_Aeq,T measure is not a completely satisfactory description of these noises and perhaps does not completely reflect the characteristics of these noises that lead to annoyance. Alternatively, the differences may be attributed to various other factors that are not part of the noise characteristics (e.g. Flindell & Stallen 1999). For example, it has been said that aircraft noise is more disturbing, because of the associated fear of aircraft crashing on people’s homes (cf. Berglund & Lindvall 1995).

2.3.6. Individual differences

Finally, there is the problem of individual response differences. Different people will respond quite differently to the same noise stimulus (Job 1988). These individual differences can be
quite large and it is often most useful to consider the average response of groups of people exposed to the same sound pressure levels. In annoyance studies the percentage of highly annoyed individuals is usually considered, because it correlates better with measured sound pressure levels. Individual differences also exist for susceptibility to hearing impairment (e.g. Katz 1994).

2.3.7. Recommendations

In many cases we do not have specific, accurate measures of how annoying sound will be and must rely on the simpler quantities. As a result, current practice is to assume that the equal energy principle is approximately valid for most types of noise, and that a simple LAeq,T type measure will indicate reasonably well the expected effects of the noise. Where the noise consists of a small number of discrete events, the A-weighted maximum level (LAmx) will be a better indicator of the disturbance to sleep and other activities. However, in most cases the A-weighted sound exposure level (SEL) will provide a more consistent measure of such single-noise events, because it is based on an integration over the complete noise event.

2.4. Measurement Issues

2.4.1. Measurement objectives

The details of noise measurements must be planned to meet some relevant objective or purpose. Some typical objectives would include:

a. Investigating complaints.
b. Assessing the number of persons exposed.
c. Compliance with regulations.
d. Land use planning and environmental impact assessments.
e. Evaluation of remedial measures.
f. Calibration and validation of predictions.
g. Research surveys.
h. Trend monitoring.

The sampling procedure, measurement location, type of measurements and the choice of equipment should be in accord with the objective of the measurements.

2.4.2. Instrumentation

The most critical component of a sound pressure meter is the microphone, because it is difficult to produce microphones with the same precision as the other, electronic components of a pressure meter. In contrast, it is usually not difficult to produce the electronic components of a microphone with the desired sensitivity and frequency-response characteristics. Lower quality microphones will usually be less sensitive and so cannot measure very low sound pressure levels. They may also not be able to accurately measure very high sound pressure levels found closer to loud noise sources. Lower quality microphones will also have less well-defined frequency-response characteristics. Such lower quality microphones may be acceptable for survey type
measurements of overall A-weighted levels, but would not be preferred for more precise measurements, including detailed frequency analysis of the sounds.

Sound pressure meters will usually include both A- and C-weighting frequency-response curves. The uses of these frequency weightings were discussed above. They may also include a linear weighting. Linear weightings are not defined in standards and may in practice be limited by the response of the particular microphone being used. Instead of, or in addition to, frequency-response weightings, more complex sound pressure meters can also include sets of standard bandpass filters, to permit frequency analysis of sounds. For acoustical measurements, octave and one-third octave bandwidth filters are widely used with centre frequencies defined in standards (ISO 1975b).

The instantaneous sound pressures are integrated with some time constant to provide sound pressure levels. As mentioned above most meters will include both Fast- and Slow-response times. Fast-response corresponds to a time constant of 0.125 s and is intended to approximate the time constant of the human hearing system. Slow-response corresponds to a time constant of 1 s and is an old concept intended to make it easier to obtain an approximate average value of fluctuating levels from simple meter readings.

Standards (IEC 1979) classify sound pressure meters as type 1 or type 2. Type 2 meters are adequate for broad band A-weighted level measurements, where extreme precision is not required and where very low sound pressure levels are not to be measured. Type 1 meters are usually much more expensive and should be used where more precise results are needed, or in cases where frequency analysis is required.

Many modern sound pressure meters can integrate sound pressure levels over some specified time period, or may include very sophisticated digital processing capabilities. Integrating meters make it possible to directly obtain accurate measures of L\text{Aeq,T} values over a user-specified time interval, T. By including small computers in some sound pressure meters, quite complex calculations can be performed on the measured levels and many such results can be stored for later read out. For example, some meters can determine the statistical distribution of sound pressure levels over some period, in addition to the simple L\text{Aeq,T} value. Recently, hand-held meters that perform loudness calculations in real time have become available. Continuing rapid developments in instrumentation capabilities are to be expected.

### 2.4.3. Measurement locations

Where local regulations do not specify otherwise, measurements of environmental noise are usually best made close to the point of reception of the noise. For example, if there is concern about residents exposed to road traffic noise it is better to measure close to the location of the residents, rather than close to the road. If environmental noises are measured close to the source, one must then estimate the effect of sound propagation to the point of reception. Sound propagation can be quite complicated and estimates of sound pressure levels at some distance from the source will inevitably introduce further errors into the measured sound pressure levels. These errors can be avoided by measuring at locations close to the point of reception.
Measurement locations should normally be selected so that there is a clear view of the sound source and so that the propagation of the sound to the microphone is not shielded or blocked by structures that would reduce the incident sound pressure levels. For example, measurements of aircraft noise should be made on the side of the building directly exposed to the noise. The position of the measuring microphone relative to building façades or other sound-reflective surfaces is also important and will significantly influence measured sound pressure levels (ISO 1978). If the measuring microphone is located more than several meters from reflecting surfaces, it will provide an unbiased indication of the incident sound pressure level. At the other extreme, when a measuring microphone is mounted on a sound-reflecting surface, such as a building façade, sound pressure levels will be increased by 6 dB, because the direct and reflected sound will coincide. Some standards recommend a position 2 m from the façade and an associated 3 dB correction (ISO 1978; ASTM 1992). The effect of façade reflections must be accounted for to represent the true level of the incident sound. Thus, while locating the measuring microphone close to the point of reception is desirable, it leads to some other issues that must be considered to accurately interpret measurement results. Where exposures are measured indoors, it is necessary to measure at several positions to characterize the average sound pressure level in a room. In other situations, it may be necessary to measure at the position of the exposed person.

2.4.4. Sampling

Many environmental noises vary over time, such as for different times of day or from season to season. For example, road traffic noise may be considerably louder during some hours of the day but much quieter at night. Aircraft noise may vary with the season due to different numbers of aircraft operations. Although permanent noise monitoring systems are becoming common around large airports, it is usually not possible to measure sound pressure levels continuously over a long enough period of time to completely define the environmental noise exposure. In practice, measurements usually only sample some part of the total exposure. Such sampling will introduce uncertainties in the estimates of the total noise exposure.

Traffic noise studies have identified various sampling schemes that can introduce errors of 2-3 dB in estimates of daytime L_{Aeq,T} values and even larger errors in night-time sound pressure levels (Vaskor et al. 1979). These errors relate to the statistical distributions of sound pressure levels over time (Bradley et al. 1979). Thus, the sampling errors associated with road traffic noise may be quite different from those associated with other noise, because of the quite different variations of sound pressure levels over time. It is also difficult to give general estimates of sampling errors due to seasonal variations. When making environmental noise measurements it is important that the measurement sample is representative of all of the variations in the noise in question, including variations of the source and variations in sound propagation, such as due to varying atmospheric conditions.

2.4.5. Calibration and quality assurance

Sound pressure meters can be calibrated using small calibrated sound sources. These devices are placed on the measurement microphone and produce a known sound pressure level with a specified accuracy. Such calibrations should be made at least daily, and more often if there is
some possibility that handling of the sound pressure meter may have modified its sensitivity. It is also important to have a complete quality assurance plan. This should require annual calibration of all noise measuring equipment to traceable standards and should clearly specify correct measurement and operating procedures (ISO 1994).

2.5. Source Characteristics and Sound Propagation

To make a correct assessment of noise it is important to have some appreciation of the characteristics of environmental noise sources and of how sound propagates from them. One should consider the directivity of noise sources, the variability with time and the frequency content. If these are in some way unusual, the noise may be more disturbing than expected. The most common types of environmental noise sources are directional and include: road-traffic noise, aircraft noise, train noise, industrial noise and outdoor entertainment facilities (cf. section 2.2). All of these types of environmental noise are produced by multiple sources, which in many cases are moving. Thus, the characteristics of individual sources, as well as the characteristics of the combined sources, must be considered.

For example, we can consider the radiation of sound from individual vehicles, as well as from a line of vehicles on a particular road. Sound from an ideal point source (i.e. non-directional source) will spread out spherically and sound pressure levels would decrease 6 dB for each doubling of distance from the source. However, for a line of such sources, or for an integration over the complete pass-by of an individual moving source, the combined effect leads to sound that spreads cylindrically and to sound pressure levels that decrease at 3 dB per doubling of distance. Thus, there are distinct differences between the propagation of sound from an ideal point source and from moving sources. In practice one cannot adequately assess the noise from a fixed source with measurements at a single location; it is essential to measure in a number of directions from the source. If the single source is moving, it is necessary to measure over a complete pass-by, to account for sound variation with direction and time.

In most real situations this simple behaviour is considerably modified by reflections from the ground and from other nearby surfaces. One expects that when sound propagates over loose ground, such as grass, that some sound energy will be absorbed and sound pressure levels will actually decrease more rapidly with distance from the source. Although this is approximately true, the propagation of sound between sources and receivers close to the ground is much more complicated than this. The combination of direct and ground-reflected sound can combine in a complex manner which can lead to strong cancellations at some frequencies and not at others (Embleton & Piercy 1976). Even at quite short source-to-receiver distances, these complex interference effects can significantly modify the propagating sound. At larger distances (approximately 100 m or more), the propagation of sound will also be significantly affected by various atmospheric conditions. Temperature and wind gradients as well as atmospheric turbulence can have large effects on more distant sound pressure levels (Daigle et al. 1986). Temperature and wind gradients can cause propagating sound to curve either upwards or downwards, creating either areas of increased or decreased sound pressure levels at points quite distant from the source. Atmospheric turbulence can randomize sound so that the interference effects resulting from combinations of sound paths are reduced. Higher frequency sound is absorbed by air depending on the exact temperature and relative humidity of the air (Crocker &
Price 1975; Ford 1987). Because there are many complex effects, it is not usually possible to accurately predict sound pressure levels at large distances from a source.

Using barriers or screens to block the direct path from the source to the receiver can reduce the propagation of sound. The attenuating effects of the screen are limited by sound energy that diffracts or bends around the screen. Screens are more effective at higher frequencies and when placed either close to the sound source or the receiver; they are less effective when placed far from the receiver. Although higher screens are better, in practice it is difficult to achieve more than about a 10 dB reduction. There should be no gaps in the screen and it must have an adequate mass per unit area. A long building can be an effective screen, but gaps between buildings will reduce the sound attenuation.

In some cases, it may be desirable to estimate environmental sound pressure levels using mathematical models implemented as computer programmes (House 1987). Such computer programmes must first model the characteristics of the source and then estimate the propagation of the sound from the source to some receiver point. Although such prediction schemes have several advantages, there will be some uncertainty as to the accuracy of the predicted sound pressure levels. Such models are particularly useful for road traffic noise and aircraft noise, because it is possible to create databases of information describing particular sources. For more varied types of noise, such as industrial noise, it would be necessary to first characterize the noise sources. The models then sum up the effects of multiple sources and calculate how the sound will propagate to receiver points. Techniques for estimating sound propagation are improving and the accuracy of these models is also expected to improve. These models can be particularly useful for estimating the combined effect of a large number of sources over an extended period of time. For example, aircraft noise prediction models are typically used to predict average yearly noise exposures, based on the combination of aircraft events over a complete year. Such models can be applied to predict sound pressure level contours around airports for these average yearly conditions. This is of course much less expensive than measuring at many locations over a complete one year-period. However, such models can be quite complex, and require skilled users and accurate data bases. Because environmental noise prediction models are still developing, it is advisable to confirm predictions with measurements.

### 2.6. Sound transmission Into and Within Buildings

Sources of environmental noise are usually located outdoors; for example, road traffic, aircraft or trains. However, people exposed to these noises are often indoors, inside their home or some other building. It is, therefore, important to understand how environmental noises are transmitted into buildings. Most of the same fundamentals discussed earlier apply to airborne sound propagation between homes in multifamily dwellings, via common walls and floors. However, within buildings we can also consider impact sound sources, such as footsteps, as well as airborne sounds.

The amount of incident sound that is transmitted through a building façade is measured in terms of the sound reduction index. The sound reduction index, or transmission loss, is defined as 10 times the logarithm of the ratio of incident-to-transmitted sound power, and it describes in decibels how much the incident sound is reduced on passing through a particular panel. This
index of constructions usually increases with the frequency of the incident sound and with the mass of the construction (Kremer 1950). Thus, heavier or more massive constructions tend to have higher sound reductions. When it is not possible to achieve the desired transmission loss by increasing the mass of a panel, increased sound reduction can be achieved by a double panel construction. The two layers should be isolated with respect to vibrations and there should be sound absorbing material in the cavity. Such double panel constructions can provide much greater sound reduction than a single panel. Because sound reduction is also greater at higher frequencies most problems occur at lower frequencies, where most environmental noise sources produce relatively high sound pressure levels.

The sound reduction of buildings can be measured in standard laboratory tests, where the test panel is constructed in an opening between two reverberant test chambers (ISO 1995; ASTM 1997). In these tests sound fields are quite diffuse in both test chambers and the sound reduction index is calculated as the difference between the average sound pressure levels in the two rooms, plus a correction involving the area of the test panel and the total sound absorption in the receiving room. The sound reduction of a complete building façade can also be measured in the field using either natural environmental noises or test signals from loudspeakers (ISO 1978; ASTM 1992). In either case the noise, as transmitted through the façade, must be greater in level than other sounds in the receiving room. For this outdoor-to-indoor sound propagation case, the measured sound reduction index will also depend on the angle of incidence of the outdoor sound, as well as the position of the outdoor measuring microphone relative to the building façade. Corrections of up to 6 dB must be made to the sound pressure level measured outdoors, to account for the effect of reflections from the façade (see also section 2.4.3).

The sound reduction of most real building façades is determined by a combination of several different elements. For example, a wall might include windows, doors or some other type of element. If the sound reduction index values of each element are known, the values for the combined construction can be calculated from the area-weighted sums of the sound energy transmitted through each separate element. Although parts of the building façade, such as massive wall constructions, can be very effective barriers to sound, the sound reduction index of the complete façade is often greatly reduced by less effective elements such as windows, doors or ventilation openings. Completely open windows as such would have a sound reduction index of 0 dB. If window openings makes up 10% of the area of a wall, the sound reduction index of the combined wall and open window could not exceed 10 dB. Thus it is not enough to specify effective sound reducing façade constructions, without also solving the problem of adequate ventilation that does not compromise the sound transmission reduction by the building façade.

Sound reduction index values are measured at different frequencies and from these, single number ratings are determined. Most common are the ISO weighted sound reduction index (ISO 1996) and the equivalent ASTM sound transmission class (ASTM 1994a). However, in their original form these single number ratings are only appropriate for typical indoor noises that usually do not have strong low frequency components. Thus, they are usually not appropriate single number ratings of the ability of a building façade to block typical environmental noises. More recent additions to the ISO procedure have included source spectrum corrections intended to correct approximately for other types of sources (ISO 1996). Alternatively, the ASTM-Outdoor-Indoor Transmission Class rating calculates the A-weighted level reduction to a

2.7. More Specialized Noise Measures

2.7.1. Loudness and perceived noise levels

There are procedures to accurately rate the loudness of complex sounds (Zwicker 1960; Stevens 1972; ISO 1975a). These usually start from a 1/3 octave spectrum of the noise. The combination of the loudness contributions of each 1/3 octave band with estimates of mutual masking effects, leads to a single overall loudness rating in sones. A similar system for rating the noisiness of sounds has also been developed (Kryter 1994). Again a 1/3 octave spectrum of the noise is required and the 1/3 octave noise levels are compared with a set of equal-noisiness contours. The individual 1/3 octave band noisiness estimates are combined to give an overall perceived noise level (PNL) that is intended to accurately estimate subjective evaluations of the same sound. The PNL metric was initially developed to rate jet aircraft noise.

PNL values will vary with time, for example when an aircraft flies by a measuring point. The effective perceived noise level measure (EPNL) is derived from PNL values and is intended to provide a complete rating of an aircraft fly-over. EPNL values add both a duration correction and a tone correction to PNL values. The duration correction ensures that longer duration events are rated as more disturbing. Similarly, noise spectra that seem to have prominent tonal components are rated as more disturbing by the tone-correction procedure. There is some evidence that these tone corrections are not always successful in improving predictions of adverse responses to noise events (Scharf & Hellman 1980). EPNL values are used in the certification testing of new aircraft. These more precise measures ensure that the noise from new aircraft is rated as accurately as possible.

2.7.2. Aviation noise measures

There are many measures for evaluating the long-term average sound pressure levels from aircraft near airports (Ford 1987; House 1987). They include different frequency weightings, different summations of levels and numbers of events, as well as different time-of-day weightings. Most measures are based on either A-weighted or PNL-weighted sound pressure levels. Because of the many other large uncertainties in predicting community response to aircraft noise, there seems little justification for using the more complex PNL-weighted sound pressure levels and there is a trend to change to A-weighted measures.

Most aviation noise measures are based on an equal energy approach and hence they sum up the total energy of a number of aircraft fly-overs. However, some older measures were based on different combinations of the level of each event and the number of events. These types of measures are gradually being replaced by measures based on the equal energy hypothesis such as L_Aeq,T values. There is also a range of time-of-day weightings incorporated into current aircraft noise measures. Night-time weightings of 6–12 dB are currently in use. Some countries also include an intermediate evening weighting.
The day-night sound pressure level $L_{dn}$ (von Gierke 1975; Ford 1987) is an $L_{Aeq,T}$ based measure with a 10 dB night-time weighting. It is based on A-weighted sound pressure levels and the equal energy principle. The noise exposure forecast (NEF) (Bishop & Horonjeff 1967) is based on the EPNL values of individual aircraft events and includes a 12 dB night-time weighting. It sums multiple events on an equal energy basis. However, the Australian variation of the NEF measure has a 6 dB evening weighting and a 6 dB night-time weighting (Bullen & Hede 1983). The German airport noise equivalent level (LEQ(FLG)) is based on A-weighted levels, but does not follow the equal energy principle.

The weighted equivalent continuous perceived noise level (WECPNL) measure (Ford 1987) proposed by ICAO is based on the equal energy principle and maximum PNL values of aircraft fly-overs. However, in Japan an approximation to this measure is used and is based on maximum A-weighted levels. The noise and number index (NNI), formerly used in the United Kingdom, was derived from maximum PNL values but was not based on the equal energy principle. An approximation to the original version of the NNI has been used in Switzerland and is based on maximum A-weighted levels of aircraft fly-overs, but its use will soon be discontinued. Changes in these measures are slow because their use is often specified in national legislation. However, several countries have changed to measures that are based on the equal energy principle and A-weighted sound pressure levels.

2.7.3. Impulsive noise measures

Impulsive sounds, such as gun shots, hammer blows, explosions of fireworks or other blasts, are sounds that significantly exceed the background sound pressure level for a very short duration. Typically each impulse lasts less than one second. Measurements with the meter set to ‘Fast’ response (section 2.1.1) do not accurately represent impulsive sounds. Therefore the meter response time must be shorter to measure such impulse type sounds. C-weighted levels have been found useful for ratings of gun shots (ISO 1987). Currently no mathematical description exists which unequivocally defines impulsive sounds, nor is there a universally accepted procedure for rating the additional annoyance of impulsive sounds (HCN 1997). Future versions of ISO Standard 1996 (present standard in ISO 1987b) are planned to improve this situation.

2.7.4. Measures of speech intelligibility

The intelligibility of speech depends primarily on the speech-to-noise ratio. If the level of the speech sounds are 15 dB or more above the level of the ambient noise, the speech intelligibility at 1 m distance will be close to 100% (Houtgast 1981; Bradley 1986b). This can be most simply rated in terms of the speech-to-noise ratio of the A-weighted speech and noise levels. Alternatively, the speech intelligibility index (formerly the articulation index) can be used if octave or 1/3 octave band spectra of the speech and noise are available (ANSI 1997).

When indoors, speech intelligibility also depends on the acoustical properties of the space. The acoustical properties of spaces have for many years been rated in terms of reverberation times. The reverberation time is approximately the time it takes for a sound in a room to decrease to inaudibility after the source has been stopped. Optimum reverberation times for speech have
been specified as a function of the size of the room. In large rooms, such as lecture halls and theaters, a reverberation time for speech of about 1 s is recommended. In smaller rooms such as classrooms, the recommended value for speech is about 0.6 s (Bradley 1986b,c). More modern measures of room acoustics have been found to be better correlates of speech intelligibility, and some combine an assessment of both the speech/noise ratio and room acoustics (Bradley 1986a,c). The most widely known is the speech transmission index (STI) (Houtgast & Steeneken 1983), or the abbreviated version of this measure referred to as RASTI (Houtgast & Steeneken 1985; IEC 1988). In smaller rooms, such as school classrooms, the conventional approach of requiring adequately low ambient noise levels, as well as some optimum reverberation time, is probably adequate to ensure good speech intelligibility (Bradley 1986b). In larger rooms and other more specialized situations, use of the more modern measures may be helpful.

2.7.5. Indoor noise ratings

The simplest procedure for rating levels of indoor noise is to measure them in terms of integrated A-weighted sound pressure levels, as measured by LAeq,T. As discussed earlier, this approach has been criticized as not being the most accurate rating of the negative effects of various types of noises, and is thought to be particularly inadequate when there are strong low-frequency components. Several more complex rating schemes are available based on octave band measurements of indoor noises. In Europe the noise rating system (Burns 1968), and in North America the noise criterion (Beranek 1971), both include sets of equal-disturbance type contours. Measured octave band sound pressure levels are compared with these contours and an overall noise rating is determined. More recently, two new schemes have been proposed: the balanced noise criterion procedure (Beranek 1989) and the room criterion system (Blazer 1998). These schemes are based on a wider range of octave bands extending from 16–8 000 Hz. They provide both a numerical and a letter rating of the noise. The numerical part indicates the level of the central frequencies important for speech communication and the letter indicates whether the quality of the sound is predominantly low-, medium- or high-frequency in nature. Extensive comparisons of these room noise rating procedures have yet to be performed. Because the newer measures include a wider range of frequencies, they can better assess a wider range of noise problems.

2.8. Summary

Where there are no clear reasons for using other measures, it is recommended that LAeq,T be used to evaluate more-or-less continuous environmental noises. LAeq,T should also be used to assess ongoing noises that may be composed of individual events with randomly varying sound pressure levels. Where the noise is principally composed of a small number of discrete events the additional use of LAm, or SEL is recommended. As pointed out in this chapter, there are definite limitations to these simple measures, but there are also many practical advantages, including economy and the benefits of a standardized approach.

The sound pressure level measurements should include all variations over time to provide results that best represent the noise in question. This would include variations in both the source and in propagation of the noise from the source to the receiver. Measurements should normally be

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made close to typical points of reception. The accuracy of the measurements and the details of the measurement procedure must be adapted to the type of noise and to other details of the noise exposure. Assessment of speech intelligibility, aviation noise or impulse noise may require the use of more specialized methods. Where the exposed people are indoors and noise measurements are made outdoors, the sound attenuating properties of the building façade must also be measured or estimated.
3. Adverse Health Effects Of Noise

3.1. Introduction

The perception of sounds in day-to-day life is of major importance for human well-being. Communication through speech, sounds from playing children, music, natural sounds in parklands, parks and gardens are all examples of sounds essential for satisfaction in every day life. Conversely, this document is related to the adverse effects of sound (noise). According to the International Programme on Chemical Safety (WHO 1994), an adverse effect of noise is defined as a change in the morphology and physiology of an organism that results in impairment of functional capacity, or an impairment of capacity to compensate for additional stress, or increases the susceptibility of an organism to the harmful effects of other environmental influences. This definition includes any temporary or long-term lowering of the physical, psychological or social functioning of humans or human organs. The health significance of noise pollution is given in this chapter under separate headings, according to the specific effects: noise-induced hearing impairment; interference with speech communication; disturbance of rest and sleep; psychophysiological, mental-health and performance effects; effects on residential behaviour and annoyance; as well as interference with intended activities. This chapter also considers vulnerable groups and the combined effects of sounds from different sources. Conclusions based on the details given in this chapter are given in Chapter 4 as they relate to guideline values.

3.2. Noise-Induced Hearing Impairment

Hearing impairment is typically defined as an increase in the threshold of hearing. It is assessed by threshold audiometry. Hearing handicap is the disadvantage imposed by hearing impairment sufficient to affect one’s personal efficiency in the activities of daily living. It is usually expressed in terms of understanding conventional speech in common levels of background noise (ISO 1990). Worldwide, noise-induced hearing impairment is the most prevalent irreversible occupational hazard. In the developing countries, not only occupational noise, but also environmental noise is an increasing risk factor for hearing impairment. In 1995, at the World Health Assembly, it was estimated that there are 120 million persons with disabling hearing difficulties worldwide (Smith 1998). It has been shown that men and women are equally at risk of noise-induced hearing impairment (ISO 1990; Berglund & Lindvall 1995).

Apart from noise-induced hearing impairment, hearing damage in populations is also caused by certain diseases; some industrial chemicals; ototoxic drugs; blows to the head; accidents; and hereditary origins. Deterioration of hearing capability is also associated with the aging process per se (presbyacusis). Present knowledge of the physiological effects of noise on the auditory system is based primarily on laboratory studies on animals. After noise exposure, the first morphological changes are usually found in the inner and outer hair cells of the cochlea, where the stereocilia become fused and bent. After more prolonged exposure, the outer and inner hair cells related to transmission of high-frequency sounds are missing. See Berglund & Lindvall (1995) for further discussion.
The ISO Standard 1999 (ISO 1990) gives a method for calculating noise-induced hearing impairment in populations exposed to all types of noise (continuous, intermittent, impulse) during working hours. Noise exposure is characterized by L.Aeq over 8 hours (L.Aeq,8h). In the Standard, the relationships between L.Aeq,8h and noise-induced hearing impairment are given for frequencies of 500–6,000 Hz, and for exposure times of up to 40 years. These relations show that noise-induced hearing impairment occurs predominantly in the high-frequency range of 3000–6000 Hz, the effect being largest at 4000 Hz. With increasing L.Aeq,8h and increasing exposure time, noise-induced hearing impairment also occurs at 2000 Hz. But at L.Aeq,8h levels of 75 dBA and lower, even prolonged occupational noise exposure will not result in noise-induced hearing impairment (ISO 1990). This value is equal to that specified in 1980 by the World Health Organization (WHO 1980a).

The ISO Standard 1999 (ISO 1990) specifies hearing impairment in statistical terms (median values, and percentile fractions between 0.05 and 0.95). The extent of noise-induced hearing impairment in populations exposed to occupational noise depends on the value of L.Aeq,8h and the number of years of noise exposure. However, for high L.Aeq,8h values, individual susceptibility seems to have a considerable effect on the rate of progression of hearing impairment. For daily exposures of 8–16 h, noise-induced hearing impairment can be reasonably well estimated from L.Aeq,8h extrapolated to the longer exposure times (Axelsson et al. 1986). In this adaptation of L.Aeq,8h for daily exposures other than 8 hours, the equal energy principle is assumed to be applicable. For example, the hearing impairment due to a 16 h daily exposure is equivalent to that at L.Aeq,8h plus 3 dB (L.Aeq,16h = L.Aeq,8h + 10*\log_{10} (16/8) = L.Aeq,8h + 3 dB. For a 24 h exposure, L.Aeq,24h = L.Aeq,8h + 10*\log_{10} (24/8) = L.Aeq,8h + 5 dB).

Since the calculation method specified in the ISO Standard 1999 (ISO 1990) is the only universally adopted method for estimating occupational noise-induced hearing impairment, attempts have been made to assess whether the method is also applicable to hearing impairment due to environmental noise, including leisure-time noise. There is ample evidence that shooting noise, with L.Aeq,24h values of up to 80 dB, induces the same hearing impairment as an equivalent occupational noise exposure (Smoorenburg 1998). Moreover, noise-induced hearing impairment studies from motorbikes are also in agreement with results from ISO Standard 1999 (ISO 1990). Hearing impairment in young adults and children 12 years and older has been assessed by L.Aeq on a 24 h time basis, for a variety of environmental and leisure-time exposure patterns (e.g. Passchier-Vermeer 1993; HCN 1994). These include pop music in discotheques and concerts (Babisch & Ising 1989; ISO 1990); pop music through headphones (Ising et al. 1994; Struwe et al. 1996; Passchier-Vermeer et al. 1998); music played by brass bands and symphony orchestras (van Hees 1992). The results are in agreement with values predicted by the ISO Standard 1999 method on the basis of adjusted time.

In the publications cited above, exposure to noise with known characteristics, such as duration and level, was related to hearing impairment. In addition to these publications, there is also an extensive literature showing hearing impairment in populations exposed to specific types of non-occupational noise, although these exposures are not well characterized. These noises originate from shooting, motorcycling, snowmobile driving, playing in arcades, listening to music at concerts and through headphones, using noisy toys, and fireworks (e.g. Brookhouser et al. 1992; see also Berglund & Lindvall 1995). Although the characteristics of these exposures are to a
certain extent unknown, the details in the publications suggest that L\(A_{eq,24h}\) values of these exposures exceed 70 dB.

In contrast, epidemiological studies failed to show hearing damage in populations exposed to an L\(A_{eq,24h}\) of less than 70 dB (Lindemann et al. 1987). The data imply that even a lifetime exposure to environmental and leisure-time noise with an L\(A_{eq,24h}\) <70 dBA would not cause hearing impairment in the large majority of people (over 95%). Overall, the results of many studies strongly suggest that the method from ISO Standard 1999 can also be used to estimate hearing impairment due to environmental and leisure-time noise, in addition to estimating the effects of occupational noise exposure.

Although the evidence suggests that the calculation method from ISO Standard 1999 (ISO 1990) should also be accepted for environmental and leisure time noise exposures, large-scale epidemiological studies of the general population do not exist to support this proposition. Taking into account the limitations of the studies, care should be taken with respect to the following aspects:

a. Data from animal experiments indicate that children may be more vulnerable in acquiring noise-induced hearing impairment than adults.

b. At very high instantaneous sound pressure levels, mechanical damage to the ear may occur (Hanner & Axelsson 1988). Occupational limits are set at peak sound pressure levels of 140 dB (EU 1986a). For adults exposed to environmental and leisure-time noise, this same limit is assumed to be valid. In the case of children, however, taking into account their habits while playing with noisy toys, peak sound pressure levels should never exceed 120 dB.

c. For shooting noise with L\(A_{eq,24h}\) over 80 dB, studies on temporary threshold shift suggest the possibility of an increased risk for noise-induced hearing impairment (Smoorenburg 1998).

d. Risk for noise-induced hearing impairment may increase when the noise exposure is combined with exposure to vibrations, the use of ototoxic drugs, or some chemicals (Fechter 1999). In these circumstances, long-term exposure to L\(A_{eq,24h}\) of 70 dBA may induce small hearing impairments.

e. It is uncertain whether the relationships between hearing impairment and noise exposure given in ISO Standard 1999 (ISO 1990) are applicable for environmental sounds of short rise time. For example, in the case of military low-altitude flying areas (75–300 m above ground) L\(A_{max}\) values of 110–130 dB occur within seconds after the onset of the sound.

Usually noise-induced hearing impairment is accompanied by an abnormal loudness perception which is known as loudness recruitment (cf. Berglund & Lindvall 1995). With a considerable loss of auditory sensitivity, some sounds may be perceived as distorted (paracusis). Another sensory effect that results from noise exposure is tinnitus (ringing in the ears). Commonly,
Tinnitus is referred to as sounds that are emitted by the inner ear itself (physiological tinnitus). Tinnitus is a common and often disturbing accompaniment of occupational hearing impairment (Vernon and Moller 1995) and has become a risk for teenagers attending pop concerts and discotheques (Hetu & Fortin 1995; Passchier-Vermeer et al. 1998; Axelsson & Prasher 1999). Noise-induced tinnitus may be temporary, lasting up to 24 hours after exposure, or may have a more permanent character, such as after prolonged occupational noise exposure. Sometimes tinnitus is due to the sound produced by the blood flow through structures in the ear.

The main social consequence of hearing impairment is an inability to understand speech in daily living conditions, which is considered a severe social handicap. Even small values of hearing impairment (10 dB averaged over 2 000 and 4 000 Hz, and over both ears) may have an effect on the understanding of speech. When the hearing impairment exceeds 30 dB (again averaged over 2 000 and 4 000 Hz and both ears) a social hearing handicap is noticeable (cf. Katz 1994; Berglund & Lindvall 1995).

In the past, hearing protection has mainly emphasized occupational noise exposures at high values of LAeq,8h, or situations with high impulsive sounds. The near-universal adoption of an LAeq,8h value of 85 dB (or lower) as the limit for unprotected occupational noise exposure, together with requirements for personal hearing protection, has made cases of severe unprotected exposures more rare. This is particularly true for developed countries. However, monitoring of compliance and enforcement action for sound pressure levels just over the limits may be weak, especially in non-industrial environments in developed countries (Franks 1998), as well as in occupational and urban environments in developing countries (Smith 1998). Nevertheless, regulations for occupational noise exposure exist almost worldwide and exposures to occupational noise are to a certain extent under control.

On the other hand, environmental noise exposures due to a number of noisy activities, especially those during leisure-time activities of children and young adults, have scarcely been regulated. Given both the increasing number of noisy activities and the increasing exposure duration, such as loud music in cars and the use of Walkmen and Discmen, regulatory activities in this field are to be encouraged. Dose-response data are lacking for the general population. However, judging from the limited data for study groups (teenagers, young adults and women), and the assumption that time of exposure can be equated with sound energy, the risk for hearing impairment would be negligible for LAEq,24h values of 70 dBA over a lifetime. To avoid hearing impairment, impulse noise exposures should never exceed 140 dB peak sound pressure in adults, and 120 dB peak sound pressure in children.

### 3.3. Interference with Speech Communication

Noise interference with speech comprehension results in a large number of personal disabilities, handicaps and behavioural changes. Problems with concentration, fatigue, uncertainty and lack of self-confidence, irritation, misunderstandings, decreased working capacity, problems in human relations, and a number of stress reactions have all been identified (Lazarus 1998). Particularly vulnerable to these types of effects are the hearing impaired, the elderly, children in the process of language and reading acquisition, and individuals who are not familiar with the spoken language (e.g., Lazarus 1998). Thus, vulnerable persons constitute a substantial
proportion of a country's population.

Most of the acoustical energy of speech is in the frequency range 100–6 000 Hz, with the most important cue-bearing energy being between 300–3 000 Hz. Speech interference is basically a masking process in which simultaneous, interfering noise renders speech incapable of being understood. The higher the level of the masking noise, and the more energy it contains at the most important speech frequencies, the greater will be the percentage of speech sounds that become indiscernible to the listener. Environmental noise may also mask many other acoustical signals important for daily life, such as door bells, telephone signals, alarm clocks, fire alarms and other warning signals, and music (e.g., Edworthy & Adams 1996). The masking effect of interfering noise in speech discrimination is more pronounced for hearing-impaired persons than for persons with normal hearing, particularly if the interfering noise is composed of speech or babble.

As the sound pressure level of an interfering noise increases, people automatically raise their voice to overcome the masking effect upon speech (increase of vocal effort). This imposes an additional strain on the speaker. For example, in quiet surroundings, the speech level at 1 m distance averages 45–50 dBA, but is 30 dBA higher when shouting. However, even if the interfering noise is moderately loud, most of the sentences during ordinary conversation can still be understood fairly well. Nevertheless, the interpretation required for compensating the masking effect of the interfering sounds, and for comprehending what was said, imposes an additional strain on the listener. One contributing factor could be that speech spoken loudly is more difficult to understand than speech spoken softly, when compared at a constant speech-to-noise ratio (cf. Berglund & Lindvall 1995).

Speech levels vary between individuals because of factors such as gender and vocal effort. Moreover, outdoor speech levels decrease by about 6 dB for a doubling in the distance between talker and listener. Speech intelligibility in everyday living conditions is influenced by speech level, speech pronunciation, talker-to-listener distance, sound pressure levels, and to some extent other characteristics of interfering noise, as well as room characteristics (e.g. reverberation). Individual capabilities of the listener, such as hearing acuity and the level of attention of the listener, are also important for the intelligibility of speech. Speech communication is affected also by the reverberation characteristics of the room. For example, reverberation times greater than 1 s produce loss in speech discrimination. Longer reverberation times, especially when combined with high background interfering noise, make speech perception more difficult. Even in a quiet environment, a reverberation time below 0.6 s is desirable for adequate speech intelligibility by vulnerable groups. For example, for older hearing-handicapped persons, the optimal reverberation time for speech intelligibility is 0.3–0.5 s (Plomp 1986).

For complete sentence intelligibility in listeners with normal hearing, the signal-to-noise ratio (i.e. the difference between the speech level and the sound pressure level of the interfering noise) should be 15–18 dBA (Lazarus 1990). This implies that in smaller rooms, noise levels above 35 dBA interferes with the intelligibility of speech (Bradley 1985). Earlier recommendations suggested that sound pressure levels as high as 45 dBA would be acceptable (US EPA 1974). With raised voice (increased vocal effort) sentences may be 100% intelligible for noise levels of up to 55 dBA; and sentences spoken with straining vocal effort can be 100% intelligible with
noise levels of about 65 dBA. For speech to be intelligible when listening to complicated messages (at school, listening to foreign languages, telephone conversation), it is recommended that the signal-to-noise ratio should be at least 15 dBA. Thus, with a speech level of 50 dBA, (at 1 m distance this level corresponds to a casual speech level of both women and men), the sound pressure level of interfering noise should not exceed 35 dBA. For vulnerable groups even lower background levels are needed. If it is not possible to meet the strictest criteria for vulnerable persons in sensitive situations (e.g. in classrooms), one should strive for as low background levels as possible.

3.4. Sleep Disturbance

Uninterrupted sleep is known to be a prerequisite for good physiological and mental functioning of healthy persons (Hobson 1989); sleep disturbance, on the other hand, is considered to be a major environmental noise effect. It is estimated that 80-90% of the reported cases of sleep disturbance in noisy environments are for reasons other than noise originating outdoors. For example, sanitary needs; indoor noises from other occupants; worries; illness; and climate (e.g. Reyner & Horne 1995). Our understanding of the impact of noise exposure on sleep stems mainly from experimental research in controlled environments. Field studies conducted with people in their normal living situations are scarce. Most of the more recent field research on sleep disturbance has been conducted for aircraft noise (Fidell et al. 1994 1995a,b 1998; Horne et al. 1994 1995; Maschke et al. 1995 1996; Ollerhead et al. 1992; Passchier-Vermeer 1999). Other field studies have examined the effects of road traffic and railway noise (Griefahn et al. 1996 1998).

The primary sleep disturbance effects are: difficulty in falling asleep (increased sleep latency time); awakenings; and alterations of sleep stages or depth, especially a reduction in the proportion of REM-sleep (REM = rapid eye movement) (Hobson 1989). Other primary physiological effects can also be induced by noise during sleep, including increased blood pressure; increased heart rate; increased finger pulse amplitude; vasoconstriction; changes in respiration; cardiac arrhythmia; and an increase in body movements (cf. Berglund & Lindvall 1995). For each of these physiological effects, both the noise threshold and the noise-response relationships may be different. Different noises may also have different information content and this also could affect physiological threshold and noise-response relationships (Edworthy 1998).

Exposure to night-time noise also induces secondary effects, or so-called after effects. These are effects that can be measured the day following the night-time exposure, while the individual is awake. The secondary effects include reduced perceived sleep quality; increased fatigue; depressed mood or well-being; and decreased performance (Öhrström 1993a; Passchier-Vermeer 1993; Carter 1996; Pearsons et al. 1995; Pearsons 1998).

Long-term effects on psychosocial well-being have also been related to noise exposure during the night (Öhrström 1991). Noise annoyance during the night-time increased the total noise annoyance expressed by people in the following 24 h. Various studies have also shown that people living in areas exposed to night-time noise have an increased use of sedatives or sleeping pills. Other frequently reported behavioural effects of night-time noise include closed bedroom windows and use of personal hearing protection. Sensitive groups include the elderly, shift
workers, persons especially vulnerable to physical or mental disorders and other individuals with sleeping difficulties.

Questionnaire data indicate the importance of night-time noise on the perception of sleep quality. A recent Japanese investigation was conducted for 3,600 women (20–80 years old) living in eight roadside zones with different road traffic noise. The results showed that four measures of perceived sleep quality (difficulty in falling asleep; waking up during sleep; waking up too early; feelings of sleeplessness one or more days a week) correlated significantly with the average traffic volumes during night-time. An in-depth investigation of 19 insomnia cases and their matched controls (age, work) measured outdoor and indoor sound pressure levels during sleep (Kageyama et al. 1997). The study showed that road traffic noise in excess of 30 dB L.Aeq for nighttime induced sleep disturbance, consistent with the results of Öhrström (1993b).

Meta-analyses of field and laboratory studies have suggested that there is a relationship between the SEL for a single night-time noise event and the percentage of people awakened, or who showed sleep stage changes (e.g. Ollerhead et al. 1992; Passchier-Vermeer 1993; Finegold et al. 1994; Pearson et al. 1995). All of these studies assumed that the number of awakenings per night for each SEL value is proportional to the number of night-time noise events. However, the results have been criticized for methodological reasons. For example, there were small groups of sleepers; too few original studies; and indoor exposure was estimated from outdoor sound pressure levels (NRC-CNRC 1994; Beersma & Altena 1995; Vallet 1998). The most important result of the meta-analyses is that there is a clear difference in the dose-response curves for laboratory and field studies, and that noise has a lower effect under real-life conditions (Pearson et al. 1995; Pearson 1998).

However, this result has been questioned, because the studies were not controlled for such things as the sound insulation of the buildings, and the number of bedrooms with closed windows. Also, only two indicators of sleep disturbance were considered (awakening and sleep stage changes). The meta-analyses thus neglected other important sleep disturbance effects (Öhrström 1993b; Carter et al. 1994a; Carter et al. 1994b; Carter 1996; Kuwano et al. 1998). For example, for road traffic noise, perceived sleep quality is related both to the time needed to fall asleep and the total sleep time (Öhrström & Björkman 1988). Individuals who are more sensitive to noise (as assessed by different questionnaires) report worse sleep quality both in field studies and in laboratory studies.

A further criticism of the meta-analyses is that laboratory experiments have shown that habituation to night-time noise events occurs, and that noise-induced awakening decreases with increasing number of sound exposures per night. This is in contrast to the assumption used in the meta-analyses, that the percentage of awakenings is linearly proportional to the number of night-time noise events. Studies have also shown that the frequency of noise-induced awakenings decreases for at least the first eight consecutive nights. So far, habituation has been shown for awakenings, but not for heart rate and after effects such as perceived sleep quality, mood and performance (Öhrström and Björkman 1988).

Other studies suggest that it is the difference in sound pressure levels between a noise event and background, rather than the absolute sound pressure level of the noise event, that determines the
reaction probability. The time interval between two noise events also has an important influence of the probability of obtaining a response (Griefahn 1977; cf. Berglund & Lindvall 1995). Another possible factor is the person’s age, with older persons having an increased probability of awakening. However, one field study showed that noise-induced awakenings are independent of age (Reyner & Horne 1995).

For a good sleep, it is believed that indoor sound pressure levels should not exceed approximately 45 dB LAmax more than 10–15 times per night (Vallet & Vernet 1991), and most studies show an increase in the percentage of awakenings at SEL values of 55–60 dBA (Passchier-Vermeer 1993; Finegold et al. 1994; Pearsons et al. 1995). For intermittent events that approximate aircraft noise, with an effective duration of 10–30 s, SEL values of 55–60 dBA correspond to a LAmax value of 45 dB. Ten to 15 of these events during an eight-hour night-time implies an LAeq,8h of 20–25 dB. This is 5–10 dB below the LAeq,8h of 30 dB for continuous night-time noise exposure, and shows that the intermittent character of noise has to be taken into account when setting night-time limits for noise exposure. For example, this can be achieved by considering the number of noise events and the difference between the maximum sound pressure level and the background level of these events.

Special attention should also be given to the following considerations:

a. Noise sources in an environment with a low background noise level. For example, night-traffic in suburban residential areas.

b. Environments where a combination of noise and vibrations are produced. For example, railway noise, heavy duty vehicles.

c. Sources with low-frequency components. Disturbances may occur even though the sound pressure level during exposure is below 30 dBA.

If negative effects on sleep are to be avoided the equivalent sound pressure level should not exceed 30 dBA indoors for continuous noise. If the noise is not continuous, sleep disturbance correlates best with LAmax and effects have been observed at 45 dB or less. This is particularly true if the background level is low. Noise events exceeding 45 dBA should therefore be limited if possible. For sensitive people an even lower limit would be preferred. It should be noted that it should be possible to sleep with a bedroom window slightly open (a reduction from outside to inside of 15 dB). To prevent sleep disturbances, one should thus consider the equivalent sound pressure level and the number and level of sound events. Mitigation targeted to the first part of the night is believed to be effective for the ability to fall asleep.
3.5. Cardiovascular and Physiological Effects

Epidemiological and laboratory studies involving workers exposed to occupational noise, and general populations (including children) living in noisy areas around airports, industries and noisy streets, indicate that noise may have both temporary and permanent impacts on physiological functions in humans. It has been postulated that noise acts as an environmental stressor (for a review see Passchier-Vermeer 1993; Berglund & Lindvall 1995). Acute noise exposures activate the autonomic and hormonal systems, leading to temporary changes such as increased blood pressure, increased heart rate and vasoconstriction. After prolonged exposure, susceptible individuals in the general population may develop permanent effects, such as hypertension and ischaemic heart disease associated with exposures to high sound pressure levels (for a review see Passchier-Vermeer 1993; Berglund & Lindvall 1995). The magnitude and duration of the effects are determined in part by individual characteristics, lifestyle behaviours and environmental conditions. Sounds also evoke reflex responses, particularly when they are unfamiliar and have a sudden onset.

Laboratory experiments and field quasi-experiments show that if noise exposure is temporary, the physiological system usually returns - after the exposure terminates - to a normal (pre-exposure) state within a time in the range of the exposure duration. If the exposure is of sufficient intensity and unpredictability, cardiovascular and hormonal responses may appear, including increases in heart rate and peripheral vascular resistance; changes in blood pressure, blood viscosity and blood lipids; and shifts in electrolyte balance (Mg/Ca) and hormonal levels (epinephrine, norepinephrine, cortisol). The first four effects are of interest because of noise-related coronary heart disease (Ising & Günther 1997). Laboratory and clinical data suggest that noise may significantly elevate gastrointestinal motility in humans.

By far the greatest number of occupational and community noise studies have focused on the possibility that noise may be a risk factor for cardiovascular disease. Many studies in occupational settings have indicated that workers exposed to high levels of industrial noise for 5–30 years have increased blood pressure and statistically significant increases in risk for hypertension, compared to workers in control areas (Passchier-Vermeer 1993). In contrast, only a few studies on environmental noise have shown that populations living in noisy areas around airports and on noisy streets have an increased risk for hypertension. The overall evidence suggests a weak association between long-term environmental noise exposure and hypertension (HCN 1994; Berglund & Lindvall 1995; IEH 1997), and no dose-response relationships could be established.

Recently, an updated summary of available studies for ischaemic heart disease has been presented (Babisch 1998a; Babisch 1998b; Babisch et al. 1999; see also Thompson 1996). The studies reviewed include case-control and cross-sectional designs, as well as three longitudinal studies. However, it has not yet been possible to conduct the most advanced quantitative integrated analysis of the available studies. Relative risks and their confidence intervals could be estimated only for the classes of high noise levels (mostly >65 dBA during daytime) and low levels (mostly <55 dBA during daytime), rather than a range of exposure levels. For methodological reasons identified in the meta-analysis, a cautious interpretation of the results is warranted (Lercher et al. 1998).
Prospective studies that controlled for confounding factors suggest an increase in ischaemic heart disease when the noise levels exceed 65–70 dB for LAeq (6–22). (For road traffic noise, the difference between LAeq (6-22h) and LAeq,24h usually is of the order of 1.5 dB). When orientation of the bedroom, window opening habits and years of exposure are taken into account, the risk of heart disease is slightly higher (Babisch et al. 1998; Babisch et al. 1999). However, disposition, behavioural and environmental factors were not sufficiently accounted for in the analyses carried out to date. In epidemiological studies the lowest level at which traffic noise had an effect on ischaemic heart disease was 70 dB for LAeq,24h (HCN 1994).

The overall conclusion is that cardiovascular effects are associated with long-term exposure to LAeq,24h values in the range of 65–70 dB or more, for both air- and road-traffic noise. However, the associations are weak and the effect is somewhat stronger for ischaemic heart disease than for hypertension. Nevertheless, such small risks are potentially important because a large number of persons are currently exposed to these noise levels, or are likely to be exposed in the future. Furthermore, only the average risk is considered and sensitive subgroups of the populations have not been sufficiently characterized. For example, a 10% increase in risk factors (a relative risk of 1.1) may imply an increase of up to 200 cases per 100 000 people at risk per year. Other observed psychophysiological effects, such as changes in stress hormones, magnesium levels, immunological indicators, and gastrointestinal disturbances are too inconsistent for conclusions to be drawn about the influence of noise pollution.

3.6. Mental Health Effects

Mental health is defined as the absence of identifiable psychiatric disorders according to current norms (Freeman 1984). Environmental noise is not believed to be a direct cause of mental illness, but it is assumed that it accelerates and intensifies the development of latent mental disorder. Studies on the adverse effects of environmental noise on mental health cover a variety of symptoms, including anxiety; emotional stress; nervous complaints; nausea; headaches; instability; argumentativeness; sexual impotency; changes in mood; increase in social conflicts, as well as general psychiatric disorders such as neurosis, psychosis and hysteria. Large-scale population studies have suggested associations between noise exposure and a variety of mental health indicators, such as single rating of well-being; standard psychological symptom profiles; the intake of psychotropic drugs; and consumption of tranquilizers and sleeping pills. Early studies showed a weak association between exposure to aircraft noise and psychiatric hospital admissions in the general population surrounding an airport (see also Berglund & Lindvall 1995). However, the studies have been criticized because of problems in selecting variables and in response bias (Halpern 1995).

Exposure to high levels of occupational noise has been associated with development of neurosis and irritability; and exposure to high levels of environmental noise with deteriorated mental health (Stansfeld 1992). However, the findings on environmental noise and mental health effects are inconclusive (HCN 1994; Berglund & Lindvall 1995; IEH 1997). The only longitudinal study in this field (Stansfeld et al. 1996) showed an association between the initial level of road traffic noise and minor psychiatric disorders, although the association for increased anxiety was weak and non-linear. It turned out that psychiatric disorders are associated with noise sensitivity,
rather than with noise exposure, and the association was found to disappear after adjustment for baseline trait anxiety. These and other results show the importance of taking vulnerable groups into account, because they may not be able to cope sufficiently with unwanted environmental noise (e.g. Stansfeld 1992). This is particularly true of children, the elderly and people with preexisting illnesses, especially depression (IEH 1997). Despite the weaknesses of the various studies, the possibility that community noise has adverse effects on mental health is suggested by studies on the use of medical drugs, such as tranquilizers and sleeping pills, on psychiatric symptoms and on mental hospital admission rates.

3.7. The Effects of Noise on Performance

It has been documented in both laboratory subjects and in workers exposed to occupational noise, that noise adversely affects cognitive task performance. In children, too, environmental noise impairs a number of cognitive and motivational parameters (Cohen et al. 1980; Evans & Lepore 1993; Evans 1998; Hygge et al. 1998; Haines et al. 1998). However, there are no published studies on whether environmental noise at home also impairs cognitive performance in adults. Accidents may also be an indicator of performance deficits. The few field studies on the effects of noise on performance and safety showed that noise may produce some task impairment and increase the number of errors in work, but the effects depend on the type of noise and the task being performed (Smith 1990).

Laboratory and workplace studies showed that noise can act as a distracting stimulus. Also, impulsive noise events (e.g. sonic booms) may produce disruptive effects as a result of startle responses. In the short term, noise-induced arousal may produce better performance of simple tasks, but cognitive performance deteriorates substantially for more complex tasks (i.e. tasks that require sustained attention to details or to multiple cues; or tasks that demand a large capacity of working memory, such as complex analytical processes). Some of the effects are related to loss in auditory comprehension and language acquisition, but others are not (Evans & Maxwell 1997). Among the cognitive effects, reading, attention, problem solving and memory are most strongly affected by noise. The observed effects on motivation, as measured by persistence with a difficult cognitive task, may either be independent or secondary to the aforementioned cognitive impairments.

Two types of memory deficits have been identified under experimental noise exposure: incidental memory and memory for materials that the observer was not explicitly instructed to focus on during a learning phase. For example, when presenting semantic information to subjects in the presence of noise, recall of the information content was unaffected, but the subjects were significantly less able to recall, for example, in which corner of the slide a word had been located. There is also some evidence that the lack of “helping behavior” that was noted under experimental noise exposure may be related to inattention to incidental cues (Berglund & Lindvall 1995). Subjects appear to process information faster in working memory during noisy performance conditions, but at a cost of available memory capacity. For example, in a running memory task, in which subjects were required to recall in sequence letters that they had just heard, subjects recalled recent items better under noisy conditions, but made more errors farther back into the list.
Experimental noise exposure consistently produces negative after-effects on performance (Glass & Singer 1972). Following exposure to aircraft noise, schoolchildren in the vicinity of Los Angeles airport were found to be deficient in proofreading, and in persistence with challenging puzzles (Cohen et al. 1980). The uncontrollability of noise, rather than the intensity of the noise, appears to be the most critical variable. The only prospective study on noise-exposed schoolchildren, designed around the move of the Munich airport (Hygge et al. 1996; Evans et al. 1998), confirmed the results of laboratory and workplace studies in adults, as well the results of the Los Angeles airport study with children (Cohen et al. 1980). An important finding was that some of the adaptation strategies for dealing with aircraft noise, such as tuning out or ignoring the noise, and the effort necessary to maintain task performance, come at a price. There is heightened sympathetic arousal, as indicated by increased levels of stress hormone, and elevation of resting blood pressure (Evans et al. 1995; Evans et al. 1998). Notably, in the airport studies reported above, the adverse effects were larger in children with lower school achievement.

For aircraft noise, it has been shown that chronic exposure during early childhood appears to impair reading acquisition and reduces motivational capabilities. Of recent concern are concomitant psychophysiological changes (blood pressure and stress hormone levels). Evidence indicates that the longer the exposure, the greater the damage. It seems clear that daycare centers and schools should not be located near major sources of noise, such as highways, airports and industrial sites.

3.8. Effects of Noise on Residential Behaviour and Annoyance

Noise annoyance is a global phenomenon. A definition of annoyance is “a feeling of displeasure associated with any agent or condition, known or believed by an individual or group to adversely affect them” (Lindvall & Radford 1973; Koelga 1987). However, apart from “annoyance”, people may feel a variety of negative emotions when exposed to community noise, and may report anger, disappointment, dissatisfaction, withdrawal, helplessness, depression, anxiety, distraction, agitation, or exhaustion (Job 1993; Fields et al. 1997 1998). Thus, although the term annoyance does not cover all the negative reactions, it is used for convenience in this document.

Noise can produce a number of social and behavioural effects in residents, besides annoyance (for review see Berglund & Lindvall 1995). The social and behavioural effects are often complex, subtle and indirect. Many of the effects are assumed to be the result of interactions with a number of non-auditory variables. Social and behavioural effects include changes in overt everyday behaviour patterns (e.g. closing windows, not using balconies, turning TV and radio to louder levels, writing petitions, complaining to authorities); adverse changes in social behaviour (e.g. aggression, unfriendliness, disengagement, non-participation); adverse changes in social indicators (e.g. residential mobility, hospital admissions, drug consumption, accident rates); and changes in mood (e.g. less happy, more depressed).

Although changes in social behaviour, such as a reduction in helpfulness and increased aggressiveness, are associated with noise exposure, noise exposure alone is not believed to be sufficient to produce aggression. However, in combination with provocation or pre-existing anger or hostility, it may trigger aggression. It has also been suspected that people are less willing to help, both during exposure and for a period after exposure. Fairly consistent evidence
shows that noise above 80 dBA is associated with reduced helping behaviour and increased aggressive behaviour. Particularly, there is concern that high-level continuous noise exposures may contribute to the susceptibility of schoolchildren to feelings of helplessness (Evans & Lepore 1993).

The effects of community noise can be evaluated by assessing the extent of annoyance (low, moderate, high) among exposed individuals; or by assessing the disturbance of specific activities, such as reading, watching television and communication. The relationship between annoyance and activity disturbances is not necessarily direct and there are examples of situations where the extent of annoyance is low, despite a high level of activity disturbance. For aircraft noise, the most important effects are interference with rest, recreation and watching television. This is in contrast to road traffic noise, where sleep disturbance is the predominant effect (Berglund & Lindvall 1995).

A number of studies have shown that equal levels of traffic and industrial noises result in different magnitudes of annoyance (Hall et al. 1981; Griffiths 1983; Miedema 1993; Bradley 1994a; Miedema & Vos 1998). This has led to criticism (e.g. Kryter 1994; Bradley 1994a) of averaged dose-response curves determined by meta-analysis, which assumed that all traffic noises are the same (Fidell et al. 1991; Fields 1994a; Finegold et al. 1994). Schultz (1978) and Miedema & Vos (1998) have synthesized curves of annoyance associated with three types of traffic noise (road, air, railway). In these curves, the percentage of people highly or moderately annoyed was related to the day and night continuous equivalent sound level, $L_{dn}$. For each of the three types of traffic noise, the percentage of highly annoyed persons in a population started to increase at an $L_{dn}$ value of 42 dBA, and the percentage of moderately annoyed persons at an $L_{dn}$ value of 37 dBA (Miedema & Vos 1998). Aircraft noise produced a stronger annoyance response than road traffic, for the same $L_{dn}$ exposure, consistent with earlier analyses (Kryter 1994; Bradley 1994a). However, caution should be exercised when interpreting synthesized data from different studies, since five major parameters should be randomly distributed for the analyses to be valid: personal, demographic, and lifestyle factors, as well as the duration of noise exposure and the population experience with noise (Kryter 1994).

Annoyance in populations exposed to environmental noise varies not only with the acoustical characteristics of the noise (source, exposure), but also with many non-acoustical factors of social, psychological, or economic nature (Fields 1993). These factors include fear associated with the noise source, conviction that the noise could be reduced by third parties, individual noise sensitivity, the degree to which an individual feels able to control the noise (coping strategies), and whether the noise originates from an important economic activity. Demographic variables such as age, sex and socioeconomic status, are less strongly associated with annoyance. The correlation between noise exposure and general annoyance is much higher at the group level than at the individual level, as might be expected. Data from 42 surveys showed that at the group level about 70% of the variance in annoyance is explained by noise exposure characteristics, whereas at the individual level it is typically about 20% (Job 1988).

When the type and amount of noise exposure is kept constant in the meta-analyses, differences between communities, regions and countries still exist (Fields 1990; Bradley 1996). This is well demonstrated by a comparison of the dose-response curve determined for road-traffic noise.
(Miedema & Vos 1998) and that obtained in a survey along the North-South transportation route through the Austrian Alps (Lercher 1998b). The differences may be explained in terms of the influence of topography and meteorological factors on acoustical measures, as well as the low background noise level on the mountain slopes.

Stronger reactions have been observed when noise is accompanied by vibrations and contains low frequency components (Paulsen & Kastka 1995; Öhrström 1997; for review see Berglund et al. 1996), or when the noise contains impulses, such as shooting noise (Buchta 1996; Vos 1996; Smoorenburg 1998). Stronger, but temporary, reactions also occur when noise exposure is increased over time, in comparison to situations with constant noise exposure (e.g. HCN 1997; Klaeboe et al. 1998). Conversely, for road traffic noise, the introduction of noise protection barriers in residential areas resulted in smaller reductions in annoyance than expected for a stationary situation (Kastka et al. 1995).

To obtain an indicator for annoyance, other methods of combining parameters of noise exposure have been extensively tested, in addition to metrics such as L_{Aeq,24h} and L_{dn}. When used for a set of community noises, these indicators correlate well both among themselves and with L_{Aeq,24h} or L_{dn} values (e.g. HCN 1997). Although L_{Aeq,24h} and L_{dn} are in most cases acceptable approximations, there is a growing concern that all the component parameters of the noise should be individually assessed in noise exposure investigations, at least in the complex cases (Berglund & Lindvall 1995).

3.9. The Effects of Combined Noise Sources

Many acoustical environments consist of sounds from more than one source. For these environments, health effects are associated with the total noise exposure, rather than with the noise from a single source (WHO 1980b). When considering hearing impairment, for example, the total noise exposure can be expressed in terms of L_{Aeq,24h} for the combined sources. For other adverse health effects, however, such a simple model most likely will not apply. It is possible that some disturbances (e.g. speech interference, sleep disturbance) may more easily be attributed to specific noises. In cases where one noise source clearly dominates, the magnitude of an effect may be assessed by taking into account the dominant source only (HCN 1997). Furthermore, at a policy level, there may be little need to identify the adverse effect of each specific noise, unless the responsibility for these effects is to be shared among several polluters (cf. The Polluter Pays Principle in Chapter 5, UNCED 1992).

There is no consensus on a model for assessing the total annoyance due to a combination of environmental noise sources. This is partly due to a lack of research into the temporal patterns of combined noises. The current approach for assessing the effects of “mixed noise sources” is limited to data on “total annoyance” transformed to mathematical principles or rules of thumb (Ronnebaum et al. 1996; Vos 1992; Miedema 1996; Berglund & Nilsson 1997). Models to assess the total annoyance of combinations of environmental noises may not be applicable to those health effects for which the mechanisms of noise interaction are unknown, and for which different cumulative or synergistic effects cannot be ruled out. When noise is combined with different types of environmental agents, such as vibrations, ototoxic chemicals, or chemical odours, again there is insufficient knowledge to accurately assess the combined effects on health.
(Berglund & Lindvall 1995; HCN 1994; Miedema 1996; Zeichart 1998; Passchier-Vermeer & Zeichart 1998). Therefore, caution should be exercised when trying to predict the adverse health effects of combined factors in residential populations.

The evidence on low-frequency noise is sufficiently strong to warrant immediate concern. Various industrial sources emit continuous low-frequency noise (compressors, pumps, diesel engines, fans, public works); and large aircraft, heavy-duty vehicles and railway traffic produce intermittent low-frequency noise. Low-frequency noise may also produce vibrations and rattles as secondary effects. Health effects due to low-frequency components in noise are estimated to be more severe than for community noises in general (Berglund et al. 1996). Since A-weighting underestimates the sound pressure level of noise with low-frequency components, a better assessment of health effects would be to use C-weighting.

In residential populations heavy noise pollution will most certainly be associated with a combination of health effects. For example, cardiovascular disease, annoyance, speech interference at work and at home, and sleep disturbance. Therefore, it is important that the total adverse health load over 24 hours be considered and that the precautionary principle for sustainable development is applied in the management of health effects (see Chapter 5).

3.10. Vulnerable Groups

Protective standards are essentially derived from observations on the health effects of noise on “normal” or “average” populations. The participants of these investigations are selected from the general population and are usually adults. Sometimes, samples of participants are selected because of their easy availability. However, vulnerable groups of people are typically underrepresented. This group includes people with decreased personal abilities (old, ill, or depressed people); people with particular diseases or medical problems; people dealing with complex cognitive tasks, such as reading acquisition; people who are blind or who have hearing impairment; fetuses, babies and young children; and the elderly in general (Jansen 1987; AAP 1997). These people may be less able to cope with the impacts of noise exposure and be at greater risk for harmful effects.

Persons with impaired hearing are the most adversely affected with respect to speech intelligibility. Even slight hearing impairments in the high-frequency range may cause problems with speech perception in a noisy environment. From about 40 years of age, people typically demonstrate an impaired ability to understand difficult, spoken messages with low linguistic redundancy. Therefore, based on interference with speech perception, a majority of the population belongs to the vulnerable group.

Children have also been identified as vulnerable to noise exposure (see Agenda 21: UNCED 1992). The evidence on noise pollution and children’s health is strong enough to warrant monitoring programmes at schools and preschools to protect children from the effects of noise. Follow up programmes to study the main health effects of noise on children, including effects on speech perception and reading acquisition, are also warranted in heavily noise polluted areas (Cohen et al. 1986; Evans et al. 1998).
The issue of vulnerable subgroups in the general population should thus be considered when developing regulations or recommendations for the management of community noise. This consideration should take into account the types of effects (communication, recreation, annoyance, etc.), specific environments (*in utero*, incubator, home, school, workplace, public institutions, etc.) and specific lifestyles (listening to loud music through headphones, or at discotheques and festivals; motor cycling, etc.).
4. Guideline Values

4.1. Introduction

The human ear and lower auditory system continuously receive stimuli from the world around us. However, this does not mean that all the acoustical inputs are necessarily disturbing or have harmful effects. This is because the auditory nerve provides activating impulses to the brain that enable us to regulate the vigilance and wakefulness necessary for optimal performance. On the other hand, there are scientific reports that a completely silent world can have harmful effects, because of sensory deprivation. Thus, both too little sound and too much sound can be harmful. For this reason, people should have the right to decide for themselves the quality of the acoustical environment they live in.

Exposure to noise from various sources is most commonly expressed as the average sound pressure level over a specific time period, such as 24 hours. This means that identical average sound levels for a given time period could be derived from either a large number of sound events with relatively low, almost inaudible levels, or from a few events with high sound levels. This technical concept does not fully agree with common experience on how environmental noise is experienced, or with the neurophysiological characteristics of the human receptor system.

Human perception of the environment through vision, hearing, touch, smell and taste is characterized by a good discrimination of stimulus intensity differences, and by a decaying response to a continuous stimulus (adaptation or habituation). Single sound events cannot be discriminated if the interval between events drops below a threshold value; if this occurs, the sound is interpreted as continuous. These characteristics are linked to survival, since new and different stimuli with low probability and high information value indicate warnings. Thus, when assessing the effects of environmental noise on people it is relevant to consider the importance of the background noise level, the number of events, and the noise exposure level independently.

Community noise studies have traditionally considered noise annoyance from single specific sources such as aircraft, road traffic or railways. In recent years, efforts have been made to compare the results from road traffic, aircraft and railway surveys. Data from a number of sources show that aircraft noise is more annoying than road traffic noise, which, in turn, is more annoying than railway noise. However, there is not a clear understanding of the mechanisms that create these differences. Some populations may also be at greater risk for the harmful effects of noise. Young children (especially during language acquisition), the blind, and perhaps fetuses are examples of such populations. There are no definite conclusions on this topic, but the reader should be alerted that guidelines in this report are developed for the population at large; guidelines for potentially more vulnerable groups are addressed only to a limited extent.

In the following, guideline values are summarized with regard to specific environments and effects. For each environment and situation, the guideline values take into consideration the identified health effects and are set, based on the lowest levels of noise that affect health (critical health effect). Guideline values typically correspond to the lowest effect level for general populations, such as those for indoor speech intelligibility. By contrast, guideline values for
annoyance have been set at 50 or 55 dBA, representing daytime levels below which a majority of the adult population will be protected from becoming moderately or seriously annoyed, respectively.

In these Guidelines for Community Noise only guideline values are presented. These are essentially values for the onset of health effects from noise exposure. It would have been preferred to establish guidelines for exposure-response relationships. Such relationships would indicate the effects to be expected if standards were set above the WHO guideline values and would facilitate the setting of standards for sound pressure levels (noise immission standards). However, exposure-response relationships could not be established as the scientific literature is very limited. The best-studied exposure-response relationship is that between $L_{dn}$ and annoyance (WHO 1995a; Berglund & Lindvall 1995; Miedema & Vos 1998). Even the most recent relationships between integrated noise levels and the percentage of highly or moderately annoyed people are still being scrutinized. The results of a forthcoming meta-analysis are expected to be published in the near future (Miedema, personal communication).

4.2. Specific Effects

4.2.1. Interference with communication

Noise tends to interfere with auditory communication, in which speech is a most important signal. However, it is also vital to be able to hear alarming and informative signals such as door bells, telephone signals, alarm clocks, fire alarms etc., as well as sounds and signals involved in occupational tasks. The effects of noise on speech discrimination have been studied extensively and deal with this problem in lexical terms (mostly words but also sentences). For communication distances beyond a few metres, speech interference starts at sound pressure levels below 50 dB for octave bands centered on the main speech frequencies at 500, 1 000 and 2 000 Hz. It is usually possible to express the relationship between noise levels and speech intelligibility in a single diagram, based on the following assumptions and empirical observations, and for speaker-to-listener distance of about 1 m:

a. Speech in relaxed conversation is 100% intelligible in background noise levels of about 35 dBA, and can be understood fairly well in background levels of 45 dBA.

b. Speech with more vocal effort can be understood when the background sound pressure level is about 65 dBA.

A majority of the population belongs to groups sensitive to interference with speech perception. Most sensitive are the elderly and persons with impaired hearing. Even slight hearing impairments in the high-frequency range may cause problems with speech perception in a noisy environment. From about 40 years of age, people demonstrate impaired ability to interpret difficult, spoken messages with low linguistic redundancy, when compared to people aged 20–30 years. It has also been shown that children, before language acquisition has been completed, have more adverse effects than young adults to high noise levels and long reverberation times.

For speech outdoors and for moderate distances, the sound level drops by approximately 6 dB for
a doubling of the distance between speaker and listener. This relationship is also applicable to indoor conditions, but only up to a distance of about 2 m. Speech communication is affected also by the reverberation characteristics of the room, and reverberation times beyond 1 s can produce a loss in speech discrimination. A longer reverberation time combined with background noise makes speech perception still more difficult.

Speech signal perception is of paramount importance, for example, in classrooms or conference rooms. To ensure any speech communication, the signal-to-noise relationship should exceed zero dB. But when listening to complicated messages (at school, listening to foreign languages, telephone conversation) the signal-to-noise ratio should be at least 15 dB. With a voice level of 50 dBA (at 1 m distance this corresponds on average to a casual voice level in both women and men), the background level should not exceed 35 dBA. This means that in classrooms, for example, one should strive for as low background levels as possible. This is particularly true when listeners with impaired hearing are involved, for example, in homes for the elderly. Reverberation times below 1 s are necessary for good speech intelligibility in smaller rooms; and even in a quiet environment a reverberation time below 0.6 s is desirable for adequate speech intelligibility for sensitive groups.

4.2.2. Noise-induced hearing impairment

The ISO Standard 1999 (ISO 1990) gives a method of calculating noise-induced hearing impairment in populations exposed to all types of occupational noise (continuous, intermittent, impulse). However, noise-induced hearing impairment is by no means restricted to occupational situations alone. High noise levels can also occur in open-air concerts, discotheques, motor sports, shooting ranges, and from loudspeakers or other leisure activities in dwellings. Other loud noise sources, such as music played back in headphones and impulse noise from toys and fireworks, are also important. Evidence strongly suggests that the calculation method from ISO Standard 1999 for occupational noise (ISO 1990) should also be used for environmental and leisure time noise exposures. This implies that long term exposure to $L_{Aeq,24h}$ of up to 70 dBA will not result in hearing impairment. However, given the limitations of the various underlying studies, care should be taken with respect to the following:

a. Data from animal experiments indicate that children may be more vulnerable in acquiring noise-induced hearing impairment than adults.

b. At very high instantaneous sound pressure levels mechanical damage to the ear may occur (Hanner & Axelsson 1988). Occupational limits are set at peak sound pressure levels of 140 dBA (EU 1986a). For adults, this same limit is assumed to be in order for exposure to environmental and leisure time noise. In the case of children, however, considering their habits while playing with noisy toys, peak sound pressure levels should never exceed 120 dBA.

c. For shooting noise with $L_{Aeq,24h}$ over 80 dB, studies on temporary threshold shift suggest there is the possibility of an increased risk for noise-induced hearing impairment (Smoorenburg 1998).
d. The risk for noise-induced hearing impairment increases when noise exposure is combined with vibrations, ototoxic drugs or chemicals (Fechter 1999). In these circumstances, long-term exposure to LAeq,24h of 70 dB may induce small hearing impairments.

e. It is uncertain whether the relationships in ISO Standard 1999 (ISO 1990) are applicable to environmental sounds having a short rise time. For example, in the case of military low-altitude flying areas (75–300 m above ground) LAmax values of 110–130 dB occur within seconds after onset of the sound.

In conclusion, dose-response data are lacking for the general population. However, judging from the limited data for study groups (teenagers, young adults and women), and on the assumption that time of exposure can be equated with sound energy, the risk for hearing impairment would be negligible for LAeq,24h values of 70 dB over a lifetime. To avoid hearing impairment, impulse noise exposures should never exceed a peak sound pressure of 140 dB peak in adults, and 120 dB in children.

4.2.3. Sleep disturbance effects

Electrophysiological and behavioral methods have demonstrated that both continuous and intermittent noise indoors lead to sleep disturbance. The more intense the background noise, the more disturbing is its effect on sleep. Measurable effects on sleep start at background noise levels of about 30 dB LAeq. Physiological effects include changes in the pattern of sleep stages, especially a reduction in the proportion of REM sleep. Subjective effects have also been identified, such as difficulty in falling asleep, perceived sleep quality, and adverse after-effects such as headache and tiredness. Sensitive groups mainly include elderly persons, shift workers and persons with physical or mental disorders.

Where noise is continuous, the equivalent sound pressure level should not exceed 30 dBA indoors, if negative effects on sleep are to be avoided. When the noise is composed of a large proportion of low-frequency sounds a still lower guideline value is recommended, because low-frequency noise (e.g. from ventilation systems) can disturb rest and sleep even at low sound pressure levels. It should be noted that the adverse effect of noise partly depends on the nature of the source. A special situation is for newborns in incubators, for which the noise can cause sleep disturbance and other health effects.

If the noise is not continuous, LAmax or SEL are used to indicate the probability of noise-induced awakenings. Effects have been observed at individual LAmax exposures of 45 dB or less. Consequently, it is important to limit the number of noise events with a LAmax exceeding 45 dB. Therefore, the guidelines should be based on a combination of values of 30 dB LAeq,8h and 45 dB LAmax. To protect sensitive persons, a still lower guideline value would be preferred when the background level is low. Sleep disturbance from intermittent noise events increases with the maximum noise level. Even if the total equivalent noise level is fairly low, a small
number of noise events with a high maximum sound pressure level will affect sleep.

Therefore, to avoid sleep disturbance, guidelines for community noise should be expressed in terms of equivalent sound pressure levels, as well as LAmx/SEL and the number of noise events. Measures reducing disturbance during the first part of the night are believed to be the most effective for reducing problems in falling asleep.

### 4.2.4. Cardiovascular and psychophysiological effects

Epidemiological studies show that cardiovascular effects occur after long-term exposure to noise (aircraft and road traffic) with LAeq,24h values of 65–70 dB. However, the associations are weak. The association is somewhat stronger for ischaemic heart disease than for hypertension. Such small risks are important, however, because a large number of persons are currently exposed to these noise levels, or are likely to be exposed in the future. Other possible effects, such as changes in stress hormone levels and blood magnesium levels, and changes in the immune system and gastro-intestinal tract, are too inconsistent to draw conclusions. Thus, more research is required to estimate the long-term cardiovascular and psychophysiological risks due to noise. In view of the equivocal findings, no guideline values can be given.

### 4.2.5. Mental health effects

Studies that have examined the effects of noise on mental health are inconclusive and no guideline values can be given. However, in noisy areas, it has been observed that there is an increased use of prescription drugs such as tranquillizers and sleeping pills, and an increased frequency of psychiatric symptoms and mental hospital admissions. This strongly suggests that adverse mental health effects are associated with community noise.

### 4.2.6. Effects on performance

The effects of noise on task performance have mainly been studied in the laboratory and to some extent in work situations. But there have been few, if any, detailed studies on the effects of noise on human productivity in community situations. It is evident that when a task involves auditory signals of any kind, noise at an intensity sufficient to mask or interfere with the perception of these signals will also interfere with the performance of the task. A novel event, such as the start of an unfamiliar noise, will also cause distraction and interfere with many kinds of tasks. For example, impulsive noises such as sonic booms can produce disruptive effects as the result of startle responses; and these types of responses are more resistant to habituation.

Mental activities involving high load in working memory, such as sustained attention to multiple cues or complex analysis, are all directly sensitive to noise and performance suffers as a result. Some accidents may also be indicators of noise-related effects on performance. In addition to the direct effects on performance, noise also has consistent after-effects on cognitive performance with tasks such as proof-reading, and on persistence with challenging puzzles. In contrast, the performance of tasks involving either motor or monotonous activities is not always degraded by noise.
Chronic exposure to aircraft noise during early childhood appears to damage reading acquisition. Evidence indicates that the longer the exposure, the greater the damage. Although there is insufficient information on these effects to set specific guideline values, it is clear that day-care centres and schools should not be located near major noise sources, such as highways, airports and industrial sites.

4.2.7. Annoyance responses

The capacity of a noise to induce annoyance depends upon many of its physical characteristics, including its sound pressure level and spectral characteristics, as well as the variations of these properties over time. However, annoyance reactions are sensitive to many non-acoustical factors of social, psychological or economic nature, and there are also considerable differences in individual reactions to the same noise. Dose-response relations for different types of traffic noise (air, road and railway) clearly demonstrate that these noises can cause different annoyance effects at equal L.Aeq,24h values. And the same type of noise, such as that found in residential areas around airports, can also produce different annoyance responses in different countries.

The annoyance response to noise is affected by several factors, including the equivalent sound pressure level and the highest sound pressure level of the noise, the number of such events, and the time of day. Methods for combining these effects have been extensively studied. The results are not inconsistent with the simple, physically based equivalent energy theory, which is represented by the L.Aeq noise index.

Annoyance to community noise varies with the type of activity producing the noise. Speech communication, relaxation, listening to radio and TV are all examples of noise-producing activities. During the daytime, few people are seriously annoyed by activities with L.Aeq levels below 55 dB; or moderately annoyed with L.Aeq levels below 50 dB. Sound pressure levels during the evening and night should be 5–10 dB lower than during the day. Noise with low-frequency components require even lower levels. It is emphasized that for intermittent noise it is necessary to take into account the maximum sound pressure level as well as the number of noise events. Guidelines or noise abatement measures should also take into account residential outdoor activities.

4.2.8. Effects on social behaviour

The effects of environmental noise may be evaluated by assessing the extent to which it interferes with different activities. For many community noises, interference with rest, recreation and watching television seem to be the most important issues. However, there is evidence that noise has other effects on social behaviour: helping behaviour is reduced by noise in excess of 80 dBA; and loud noise increases aggressive behavior in individuals predisposed to aggressiveness. There is concern that schoolchildren exposed to high levels of chronic noise could be more susceptible to helplessness. Guidelines on these issues must await further research.
4.3. Specific Environments

Noise measures based solely on LAeq values do not adequately characterize most noise environments and do not adequately assess the health impacts of noise on human well-being. It is also important to measure the maximum noise level and the number of noise events when deriving guideline values. If the noise includes a large proportion of low-frequency components, values even lower than the guideline values will be needed, because low-frequency components in noise may increase the adverse effects considerably. When prominent low-frequency components are present, measures based on A-weighting are inappropriate. However, the difference between dBC (or dBlin) and dBA will give crude information about the presence of low-frequency components in noise. If the difference is more than 10 dB, it is recommended that a frequency analysis of the noise be performed.

4.3.1. Dwellings

In dwellings, the critical effects of noise are on sleep, annoyance and speech interference. To avoid sleep disturbance, indoor guideline values for bedrooms are 30 dB LAeq for continuous noise and 45 dB LAmx for single sound events. Lower levels may be annoying, depending on the nature of the noise source. The maximum sound pressure level should be measured with the instrument set at “Fast”.

To protect the majority of people from being seriously annoyed during the daytime, the sound pressure level on balconies, terraces and outdoor living areas should not exceed 55 dB LAeq for a steady, continuous noise. To protect the majority of people from being moderately annoyed during the daytime, the outdoor sound pressure level should not exceed 50 dB LAeq. These values are based on annoyance studies, but most countries in Europe have adopted 40 dB LAeq as the maximum allowable level for new developments (Gottlob 1995). Indeed, the lower value should be considered the maximum allowable sound pressure level for all new developments whenever feasible.

At night, sound pressure levels at the outside façades of the living spaces should not exceed 45 dB LAeq and 60 dB LAmx, so that people may sleep with bedroom windows open. These values have been obtained by assuming that the noise reduction from outside to inside with the window partly open is 15 dB.

4.3.2. Schools and preschools

For schools, the critical effects of noise are on speech interference, disturbance of information extraction (e.g. comprehension and reading acquisition), message communication and annoyance. To be able to hear and understand spoken messages in classrooms, the background sound pressure level should not exceed 35 dB LAeq during teaching sessions. For hearing impaired children, an even lower sound pressure level may be needed. The reverberation time in the classroom should be about 0.6 s, and preferably lower for hearing-impaired children. For assembly halls and cafeterias in school buildings, the reverberation time should be less than 1 s. For outdoor playgrounds, the sound pressure level of the noise from external sources should not
exceed 55 dB LAeq, the same value given for outdoor residential areas in daytime.

For preschools, the same critical effects and guideline values apply as for schools. In bedrooms in preschools during sleeping hours, the guideline values for bedrooms in dwellings should be used.

4.3.3. Hospitals

For most spaces in hospitals, the critical effects of noise are on sleep disturbance, annoyance and communication interference, including interference with warning signals. The LAmx of sound events during the night should not exceed 40 dB indoors. For wardrooms in hospitals, the guideline values indoors are 30 dB LAeq, together with 40 dB LAmx during the night. During the day and evening the guideline value indoors is 30 dB LAeq. The maximum level should be measured with the instrument set at "Fast".

Since patients have less ability to cope with stress, the equivalent sound pressure level should not exceed 35 dB LAeq in most rooms in which patients are being treated or observed. Particular attention should be given to the sound pressure levels in intensive care units and operating theatres. Sound inside incubators may result in health problems, including sleep disturbance, and may lead to hearing impairment in neonates. Guideline values for sound pressure levels in incubators must await future research.

4.3.4. Ceremonies, festivals and entertainment events

In many countries, there are regular ceremonies, festivals and other entertainment to celebrate life events. Such events typically produce loud sounds including music and impulsive sounds. There is widespread concern about the effect of loud music and impulse sounds on young people who frequently attend concerts, discotheques, video arcades, cinemas, amusement parks and spectator events, etc. The sound pressure level is typically in excess of 100 dB LAeq. Such a noise exposure could lead to significant hearing impairment after frequent attendance.

Noise exposure for employees of these venues should be controlled by established occupational standards. As a minimum, the same standards should apply to the patrons of these premises. Patrons should not be exposed to sound pressure levels greater than 100 dB LAeq during a 4-h period, for at most four times per year. To avoid acute hearing impairment the LAmx should always be below 110 dB.

4.3.5. Sounds through headphones

To avoid hearing impairment in both adults and children from music and other sounds played back in headphones, the LAeq,24h should not exceed 70 dB. This implies that for a daily one-hour exposure the LAeq should not exceed 85 dB. The exposures are expressed in free-field equivalent sound pressure levels. To avoid acute hearing impairment, the LAmx should always be below 110 dB.
4.3.6. Impulsive sounds from toys, fireworks and firearms

To avoid acute mechanical damage to the inner ear, adults should never be exposed to more than 140 dB peak sound pressure. To account for the vulnerability in children, the peak sound pressure level produced by toys should not surpass 120 dB, measured close to the ears (100 mm). To avoid acute hearing impairment, LAmax should always be below 110 dB.

4.3.7. Parkland and conservation areas

Existing large quiet outdoor areas should be preserved and the signal-to-noise ratio kept low.

4.4. WHO Guideline Values

The WHO guideline values in Table 4.1 are organized according to specific environments. When multiple adverse health effects are identified for a given environment, the guideline values are set at the level of the lowest adverse health effect (the critical health effect). An adverse health effect of noise refers to any temporary or long-term deterioration in physical, psychological or social functioning that is associated with noise exposure. The guideline values represent the sound pressure levels that affect the most exposed receiver in the listed environment.

The time base for LAeq for “daytime” and “night-time” is 16 h and 8 h, respectively. No separate time base is given for evenings alone, but typically, guideline value should be 5 –10 dB lower than for a 12 h daytime period. Other time bases are recommended for schools, preschools and playgrounds, depending on activity.

The available knowledge of the adverse effects of noise on health is sufficient to propose guideline values for community noise for the following:

a. Annoyance.
b. Speech intelligibility and communication interference.
c. Disturbance of information extraction.
d. Sleep disturbance.
e. Hearing impairment.

The different critical health effects are relevant to specific environments, and guideline values for community noise are proposed for each environment. These are:

a. Dwellings, including bedrooms and outdoor living areas.
b. Schools and preschools, including rooms for sleeping and outdoor playgrounds.
c. Hospitals, including ward and treatment rooms.
d. Industrial, commercial shopping and traffic areas, including public addresses, indoors and outdoors.
e. Ceremonies, festivals and entertainment events, indoors and outdoors.
f. Music and other sounds through headphones.
g. Impulse sounds from toys, fireworks and firearms.
h. Outdoors in parkland and conservation areas.

It is not enough to characterize the noise environment in terms of noise measures or indices based only on energy summation (e.g. LAeq), because different critical health effects require different descriptions. Therefore, it is important to display the maximum values of the noise fluctuations, preferably combined with a measure of the number of noise events. A separate characterization of noise exposures during night-time would be required. For indoor environments, reverberation time is also an important factor. If the noise includes a large proportion of low frequency components, still lower guideline values should be applied.

Supplementary to the guideline values given in Table 4.1, precautionary recommendations are given in Section 4.2 and 4.3 for vulnerable groups, and for noise of a certain character (e.g. low-frequency components, low background noise), respectively. In Section 3.10, information is given regarding which critical effects and specific environments are considered relevant for vulnerable groups, and what precautionary noise protection would be needed in comparison to the general population.
Table 4.1: Guideline values for community noise in specific environments.

<table>
<thead>
<tr>
<th>Specific environment</th>
<th>Critical health effect(s)</th>
<th>$L_A^{eq}$ [dB]</th>
<th>Time base [hours]</th>
<th>$L_A^{max}$, fast [dB]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Outdoor living area</td>
<td>Serious annoyance, daytime and evening</td>
<td>55</td>
<td>16</td>
<td>-</td>
</tr>
<tr>
<td></td>
<td>Moderate annoyance, daytime and evening</td>
<td>50</td>
<td>16</td>
<td>-</td>
</tr>
<tr>
<td>Dwelling, indoors</td>
<td>Speech intelligibility and moderate annoyance, daytime and evening</td>
<td>35</td>
<td>16</td>
<td>-</td>
</tr>
<tr>
<td>Inside bedrooms</td>
<td>Sleep disturbance, night-time</td>
<td>30</td>
<td>8</td>
<td>45</td>
</tr>
<tr>
<td>Outside bedrooms</td>
<td>Sleep disturbance, window open (outdoor values)</td>
<td>45</td>
<td>8</td>
<td>60</td>
</tr>
<tr>
<td>School class rooms and pre-schools, indoors</td>
<td>Speech intelligibility, disturbance of information extraction, message communication</td>
<td>35</td>
<td>during class</td>
<td>-</td>
</tr>
<tr>
<td>Pre-school bedrooms, indoors</td>
<td>Sleep disturbance</td>
<td>30</td>
<td>sleeping time</td>
<td>45</td>
</tr>
<tr>
<td>School, playground outdoor</td>
<td>Annoyance (external source)</td>
<td>55</td>
<td>during play</td>
<td>-</td>
</tr>
<tr>
<td>Hospital, ward rooms, indoors</td>
<td>Sleep disturbance, night-time</td>
<td>30</td>
<td>8</td>
<td>40</td>
</tr>
<tr>
<td></td>
<td>Sleep disturbance, daytime and evenings</td>
<td>30</td>
<td>16</td>
<td>-</td>
</tr>
<tr>
<td>Hospitals, treatment rooms, indoors</td>
<td>Interference with rest and recovery</td>
<td>#1</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Industrial, commercial shopping and traffic areas, indoors and outdoors</td>
<td>Hearing impairment</td>
<td>70</td>
<td>24</td>
<td>110</td>
</tr>
<tr>
<td>Ceremonies, festivals and entertainment events</td>
<td>Hearing impairment (patrons:&lt;5 times/year)</td>
<td>100</td>
<td>4</td>
<td>110</td>
</tr>
<tr>
<td>Public addresses, indoors and outdoors</td>
<td>Hearing impairment</td>
<td>85</td>
<td>1</td>
<td>110</td>
</tr>
<tr>
<td>Music through headphones/earphones</td>
<td>Hearing impairment (free-field value)</td>
<td>85 #4</td>
<td>1</td>
<td>110</td>
</tr>
<tr>
<td>Impulse sounds from toys, fireworks and firearms</td>
<td>Hearing impairment (adults)</td>
<td>-</td>
<td>-</td>
<td>140 #2</td>
</tr>
<tr>
<td></td>
<td>Hearing impairment (children)</td>
<td>-</td>
<td>-</td>
<td>120 #2</td>
</tr>
<tr>
<td>Outdoors in parkland and conservation areas</td>
<td>Disruption of tranquillity</td>
<td>#3</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

#1: as low as possible;
#2: peak sound pressure (not $L_A^{max}$, fast), measured 100 mm from the ear;
#3: existing quiet outdoor areas should be preserved and the ratio of intruding noise to natural background sound should be kept low;
#4: under headphones, adapted to free-field values
5. Noise Management

The goal of noise management is to maintain low noise exposures, such that human health and well-being are protected. The specific objectives of noise management are to develop criteria for the maximum safe noise exposure levels, and to promote noise assessment and control as part of environmental health programmes. This is not always achieved (Jansen 1998). The United Nations’ Agenda 21 (UNCED 1992), as well as the European Charter on Transport, Environment and Health (London Charter 1999), both support a number of environmental management principles on which government policies, including noise management policies, can be based. These include:

a. **The precautionary principle.** In all cases, noise should be reduced to the lowest level achievable in a particular situation. Where there is a reasonable possibility that public health will be damaged, action should be taken to protect public health without awaiting full scientific proof.

b. **The polluter pays principle.** The full costs associated with noise pollution (including monitoring, management, lowering levels and supervision) should be met by those responsible for the source of noise.

c. **The prevention principle.** Action should be taken where possible to reduce noise at the source. Land-use planning should be guided by an environmental health impact assessment that considers noise as well as other pollutants.

The government policy framework is the basis of noise management. Without an adequate policy framework and adequate legislation it is difficult to maintain an active or successful noise management programme. A policy framework refers to transport, energy, planning, development and environmental policies. The goals are more readily achieved if the interconnected government policies are compatible, and if issues which cross different areas of government policy are co-ordinated.

5.1. Stages in Noise Management

A legal framework is needed to provide a context for noise management (Finegold 1998; Hede 1998a). While there are many possible models, an example of one is given in Figure 5.1. This model depicts the six stages in the process for developing and implementing policies for community noise management. For each policy stage, there are groups of ‘policy players’ who ideally would participate in the process.
**Figure 5.1.** A model of the policy process for community noise management (Hede 1998a)

When goals and policies have been developed, the next stage is the development of the strategy or plan. Figure 5.2 summarizes the stages involved in the development of a noise management strategy. Specific abatement measures 19 are listed in Table 5.1.
Figure 5.2. Stages involved in the development of a noise abatement strategy.
<table>
<thead>
<tr>
<th><strong>Legal measures</strong></th>
<th><strong>Examples</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Control of noise emissions</td>
<td>Emission standards for road and off-road vehicles; emission standards for construction equipment; emission standards for plants; national regulations, EU Directives</td>
</tr>
<tr>
<td>Control of noise transmission</td>
<td>Regulations on sound-obstructive measures</td>
</tr>
<tr>
<td>Noise mapping and zoning around roads, airports, industries</td>
<td>Initiation of monitoring and modeling programmes</td>
</tr>
<tr>
<td>Control of noise immissions</td>
<td>Limits for exposure levels such as national immission standards; noise monitoring and modeling; regulations for complex noise situations; regulations for recreational noise</td>
</tr>
<tr>
<td>Speed limits</td>
<td>Residential areas; hospitals</td>
</tr>
<tr>
<td>Enforcement of regulations</td>
<td>Low Noise Implementation Plan</td>
</tr>
<tr>
<td>Minimum requirements for acoustical properties of buildings</td>
<td>Construction codes for sound insulation of building parts</td>
</tr>
</tbody>
</table>

**Engineering Measures**

<table>
<thead>
<tr>
<th><strong>Examples</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Emission reduction by source modification</td>
</tr>
<tr>
<td>New engine technology</td>
</tr>
<tr>
<td>Transmission reduction</td>
</tr>
<tr>
<td>Orientation of buildings</td>
</tr>
<tr>
<td>Traffic management</td>
</tr>
<tr>
<td>Passive protection</td>
</tr>
<tr>
<td>Implementation of land-use planning</td>
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</tbody>
</table>

**Education and information**

<table>
<thead>
<tr>
<th><strong>Examples</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>Raising public awareness</td>
</tr>
<tr>
<td>Monitoring and modeling of soundscapes</td>
</tr>
<tr>
<td>Sufficient number of noise experts</td>
</tr>
<tr>
<td>Initiation of research and development</td>
</tr>
<tr>
<td>Initiation of behaviour changes</td>
</tr>
</tbody>
</table>
The process outlined in Figure 5.2 can start with the development of noise standards or guidelines. Ideally, it should also involve the identification and mapping of noise sources and exposed communities. Meteorological conditions and noise levels would also normally be monitored. These data can be used to validate the output of models that estimate noise levels. Noise standards and model outputs may be considered in devising noise control tactics aimed at achieving the noise standards. Before being enforced, current control tactics need to be revised, and if the standards are achieved they need continued enforcement. If the standards are not achieved after a reasonable period of time, the noise control tactics may need to be revised.

National noise standards can usually be based on a consideration of international guidelines, such as these Guidelines for Community Noise, as well as national criteria documents, which consider dose-response relations for the effects of noise on human health. National standards take into account the technological, social, economic, political and other factors specific for the country.

In many cases monitoring may show that noise levels are considerably higher than established guidelines. This may be particularly true in developing countries, and the question has to be raised as to whether national standards should reflect the optimum levels needed to protect human health, when this objective is unlikely to be achieved in the short- or medium-term with available resources. In some countries noise standards are set at levels that are realistically attainable under prevailing technological, social, economic and political conditions, even though they may not be fully consistent with the levels needed to protect human health. In such cases, a staged programme of noise abatement should be implemented to achieve the optimum health protection levels over the long term. Noise standards periodically change after reviews, as conditions in a country change over time, and with improved scientific understanding of the relationship between noise pollution and the health of the population. Noise level monitoring (Chapter 2) is used to assess whether noise levels at particular locations are in compliance with the standards selected.

5.2. Noise Exposure Mapping

A crucial component of a low-noise implementation plan is a reasonably quantitative knowledge of exposure (see Figure 5.2). Exposure should be mapped for all noise sources impacting a community; for example, road traffic, aircraft, railway, industry, construction, festivals and human activity in general. For some components of a noise exposure map or noise exposure inventory, accurate data may be available. In other cases, exposure can be calculated from the characteristics of the mechanical processes. While estimates of noise emissions are needed to develop exposure maps, measurements should be undertaken to confirm the veracity of the assumptions used in the estimates. Sample surveys may be used to provide an overall picture of the noise exposure. Such surveys would take account of all the relevant characteristics of the noise source. For example motor vehicle emissions may be estimated by calculations involving the types of vehicles, their number, their age and the characteristic properties of the road surface.

In developing countries, there is usually a lack of appropriate statistical information to produce noise exposure estimates. However, where action is needed to lower noise levels, the absence of comprehensive information should not prevent the development of provisional noise exposure estimates. Basic information about the exposed population, transport systems, industry and other
relevant factors can be used to calculate provisional noise exposures. These can then be used to develop and implement interim noise management plans. The preliminary exposure estimates can be revised as more accurate information becomes available.

5.3. Noise Exposure Modeling

As indicated in Chapter 2 modeling is a powerful tool for the interpolation, prediction and optimization of control strategies. However, models need to be validated by monitoring data. A strength of models is that they enable examination and comparison of the consequences for noise exposure of the implementation of the various options for improving noise. However, the accuracy of the various models available depends on many factors, including the accuracy of the source emissions data and details of the topography (for which a geographical information system may be used). For transportation noise parameters such as the number, type and speed of vehicles, aircraft or trains, and the noise characteristics of each individual event must be known. An example of a model is the annoyance prediction model of the Government of the Netherlands (van den Berg 1996).

5.4. Noise Control Approaches

An integrated noise policy should include several control procedures: measures to limit the noise at the source, noise control within the sound transmission path, protection at the receiver’s site, land-use planning, education and raising of public awareness. Ideally, countries should give priority to precautionary measures that prevent noise, but they must also implement measures to mitigate existing noise problems.

5.4.1. Mitigation measures

The most effective mitigation measure is to reduce noise emissions at the source. Therefore, regulations with noise level limits for the main noise sources should be introduced.

Road traffic noise. Limits on the noise emission of vehicles have been introduced in many countries (Sandberg 1995). Such limits, together with the relevant measuring methods, should also be introduced in other regions of the world. Besides these limits a special class of “low-noise trucks” has been introduced in Europe. These trucks follow state-of-the-art noise control and are widely used in Austria and Germany (Lang 1995). Their use is encouraged by economic incentives; for example, low-noise trucks are excepted from a night-time ban on certain routes, and their associated taxes are lower than for other trucks. In Europe, the maximum permissible noise levels range from 69 dBA for motor vehicles to 77 dBA for cars, and 83 dBA for heavy two-wheeled vehicles to 84 dBA for trucks. A number of European Directives give permissible sound levels for motor vehicles and motorcycles (EU 1970; EU 1978; EU 1996a; EU 1997). In addition to noise level limits for new vehicles (type test), noise emissions of vehicles already in use should be controlled regularly. Limits on the sound pressure levels for vehicles reduce the noise emission from the engines.

However, the main noise from traffic on highways is rolling noise. This may be reduced by quiet road surfaces (porous asphalt, “drain asphalt”) or by selection of quiet tires. Road traffic
noise may also be reduced by speed limits, provided the limits are enforced. For example, reducing the speed of trucks from 90 to 60 km/h on concrete roads would reduce the maximum sound pressure level by 5 dB, and the equivalent sound pressure level by 4 dB. Decreasing the speed of cars from 140 to 100 km/h would result in the same noise reduction (WHO 1995a). In the central parts of cities a speed limit of 30 km/h may be introduced. At 30 km/h cars produce maximum sound pressure levels that are 7 dB lower, and equivalent sound pressure levels that are 5 dB lower, than cars driving at 50 km/h.

Noise emission from road traffic may be further reduced by a night-time ban for all vehicles, or especially for heavy vehicles. Traffic management designed to ensure uniform traffic flow in towns also serves to reduce noise. “Low-noise behaviour” of drivers should be encouraged as well, by advocating defensive driving manners. In some countries, car drivers use their horns frequently, which results in noise with high peak levels. The unnecessary use of horns within cities should be forbidden, especially during night-time, and this rule should be enforced.

**Railway noise and noise from trams.** The main noise sources are the engine and the wheel-rail contact. Noise at the source can be reduced by well-maintained rails and wheels, and by the use of disc brakes. Sound pressure levels may vary by more than 10 dB, depending on the type of railway material. Replacement of steel wheels by rubber wheels could also reduce noise from railways and trams substantially. Other measures include innovations in engine and track technology (Moehler 1988; Öhrström & Skånberg 1996).

**Aircraft noise.** The noise emission of aircraft is limited by ICAO Annex 16, Chapter 2 and Chapter 3, which estimates maximum potential sound emissions under certification procedures (ICAO 1993). Aircraft following the norms of Chapter 3 represent the state-of-the-art of noise control of the 1970s. In many countries, non-certified aircraft (i.e. aircraft not fulfilling the ICAO requirements) are not permitted and Chapter 2 aircraft may not be registered again. After the year 2002 only Chapter 3 aircraft will be allowed to operate in many countries.

Similar legislation should be adopted in other countries. The use of low-noise aircraft may also be encouraged by setting noise-related charges (that is, landing charges that are related not only to aircraft weight and capacity, but also to noise emission). Examples of systems for noise-related financial charges are given in OECD 1991 (see also OECD-ECMT 1995). Night-time aircraft movements should be discouraged where they impact residential communities. Particular categories of aircraft (such as helicopters, rotorcraft and supersonic aircraft) pose additional problems that require appropriate controls. For subsonic airplanes two EU Directive give the permissible sound levels (EU 1980; EU 1989).

**Machines and Equipment.** Noise emission has to be considered a main property of all types of machines and equipment. Control measures include design, insulation, enclosure and maintenance.

Consumers should be encouraged to take noise emission into account when buying a product. Declaring the A-weighted sound power level of a product would assist the consumer in making this decision. The introduction of sound labeling is a major tool for reducing the noise emission of products on the market. For example, within the European Community, “permissible sound
levels" and "sound power levels" have to be stated for several groups of machines; for example, lawn mowers, construction machines and household equipment (EU 1984a-f, EU 1986b,c). For other groups of machines sound level data have been compiled and are state-of-the-art with respect to noise control.

A second step would be the introduction of limits on the sound power levels for certain groups of machines, heating and ventilation systems (e.g. construction machines, household appliances). These limits may be set by law, in recommendations and by consumers, using state-of-the-art measurements. There have also been promising developments in the use of active noise control (involving noise cancellation techniques). These are to be encouraged.

**Noise control within the sound transmission path.** The installation of noise barriers can protect dwellings close to the traffic source. In several European countries noise barrier regulations have been established (WHO 1995b), but in practice they are often not adequately implemented. These regulations must define:

- Measuring and calculation methods for deriving the equivalent sound pressure level of road or railway traffic, and schemes for determining the effectiveness of the barrier.
- The sound pressure limits that are to be achieved by installing barriers.
- The budgetary provisions.
- The responsible authority.

**Noise protection at the receiver's site.** This approach is mainly used for existing situations. However, this approach must also be considered for new and, eventually, for old buildings in noisy areas. Residential buildings near main roads with heavy traffic, or near railway lines, may be provided with sound-proofed windows.

### 5.4.2. Precautionary measures

With careful planning, noise exposure can be avoided or reduced. A sufficient distance between residential areas and an airport will make noise exposure minimal, although the realization of such a situation is not always possible. Additional insulation of houses can help to reduce noise exposure from railroad and road traffic. For new buildings, standards or building codes should describe the positions of houses, as well as the ground plans of houses with respect to noise sources. The required sound insulation of the façades should also be described. Various countries have set standards for the maximum sound pressure levels in front of buildings and for the minimum sound insulation values required for façades.

**Land use planning.** Land use planning is one of the main tools for noise control and includes:

- Calculation methods for predicting the noise impact caused by road traffic, railways,
airports, industries and others.

b. Noise level limits for various zones and building types. The limits should be based on annoyance responses to noise.

c. Noise maps or noise inventories that show the existing noise situation. The construction of noise-sensitive buildings in noisy areas, or the construction of noisy buildings in quiet areas may thus be avoided.

Suggestions on how to use land use planning tools are given in several dedicated books (e.g. Miller & de Roo 1997). Different zones, such as quiet areas, hospitals, residential areas, commercial and industrial districts, can be characterized by the maximum equivalent sound pressure levels permissible in the zones. Examples of this approach can be found in OECD 1991 (also see OECD-ECMT 1995). More emphasis needs to be given to the design or retrofit of urban centres, with noise management as a priority (e.g. "soundscapes").

It is recommended that countries adopt the precautionary principle in their national noise policies. This principle should be applied to all noise situations where adverse noise effects are either expected or possible, even when the noise is below standard values.

**Education and public awareness.** Noise abatement policies can only be established if basic knowledge and background material is available, and the people and authorities are aware that noise is an environmental hazard that needs to be controlled. It is, therefore, necessary to include noise in school curricula and to establish scientific institutes to study acoustics and noise control. People working in such institutes should have the option of studying in other countries and exchanging information at international conferences. Dissemination of noise control information to the public is an issue for education and public awareness. Ideally, national and local advisory groups should be formed to promote the dissemination of information, to establish uniform methods of noise measurement and impact assessment, and to participate in the development and implementation of educational and public awareness programmes.

**5.5. Evaluation of Control Options**

Unless legal constraints in a country prescribe a particular option, the evaluation of control options must take into account technical, financial, social, health and environmental factors. The speed with which control options can be implemented, and their enforceability, must also be considered. Although considerable improvements in noise levels have been achieved in some developed countries, the financial costs have been high, and the resource demands of some of these approaches make them unsuitable for the poorer developing countries.

**Technical factors.** There needs to be confidence that the selected options are technically practical given the resources of the region. It must be possible to bring a selected option into operation, and maintain the expected level of performance in the long term, given the resources available. This may require regular staff training and other programmes, especially in developing countries.
Financial factors. The selected options must be financially viable in the long term. This may require a comparative cost-benefit assessment of different options. These assessments must include not only the capital costs of bringing an option into operation, but also the costs of maintaining the expected level of performance in the long term.

Social factors. The costs and benefits of each option should be assessed for social equity, and the potential impact of an option on people’s way of life, community structures and cultural traditions must be considered. Impacts may include disruption or displacement of residents, changes of land-use, and impacts on community, culture and recreation. Some impacts can be managed; in other cases, the impacts of an option can be mitigated by substitution of resources or uses.

Health and environmental factors. The costs and benefits of each option should be assessed for health and environmental factors. This may involve use of dose-response relations, or risk assessment techniques.

Effect-oriented and source-oriented principles. Noise control requirements in European countries are typically determined from the effects of noise on health and the environment (effect oriented) (e.g. Gottlob 1995; ten Wolde 1998). Increased noise emissions may be permitted if there would be no adverse health impacts, or if noise standards would not be exceeded. Action may be taken to reduce noise levels when it is shown that adverse health impacts will occur, or when noise levels exceed limits. Other countries base their noise management policies on the requirement for best available technology, or for best available techniques that do not entail excessive cost (source-oriented) (e.g. for aircraft noise, ICAO 1993; for road traffic noise, Sandberg 1995). Most developed countries apply a combination of both source-oriented and effect-oriented principles (EU 1996b; Jansen 1998; ten Wolde 1998).

5.6. Management of Indoor Noise

In modern societies, human beings spend most of their time in indoor environments. Pollution and degradation of the indoor environment cause illness, increased mortality, loss of productivity, and have major economic and social implications. Indoor noise problems are related to inadequate urban planning, design, operation and maintenance of buildings, and to the materials and equipment in buildings. Problems with indoor noise affect all types of buildings, including homes, schools, offices, health care facilities and other public and commercial buildings. The health effects of indoor noise include an increase in the rates of diseases and disturbances described in chapter 2. World-wide, the medical and social cost associated with these illnesses, and the related reduction in human productivity, can result in substantial economic losses.

Protection against noise generated within a building, or originating from outside the building, is a very complex problem. Soundproofing of ceilings, walls, doors and windows against airborne noise is important. Soundproofing of ceilings has to be sufficient to absorb sounds due to treading. Finally, noise emissions from the technological devices in the house must be sufficiently low. Governments should provide measurement protocols and data for use in reducing noise exposures in buildings. Governments should also be encouraged to support
research on the relationship between noise levels inside buildings and health effects.

5.6.1. Government policy on indoor noise

Many of the problems associated with high noise levels can be prevented at low cost if governments develop and implement an integrated strategy for the indoor environment, in concert with all social and economic partners. Governments should establish a "National Plan for a Sustainable Indoor Noise Environment", that would apply to new construction as well as to existing buildings. Governments should set up a specific structure at an appropriate governmental level to achieve acceptable sound exposure levels within buildings. An example of existing documents that provide guidance and regulations, including strategies and management for the design of buildings, is given by Jansen & Gottlob (1996).

Guidance/education. Because our understanding of indoor noise is still developing, government activity should be focused on raising the awareness of various audiences. This education can take the form of providing general information, as well as providing technical guidance and training on how to minimize indoor noise levels. General information presented in the form of documents, videos, and other media can bring indoor noise issues to the attention of the general public and building professionals, including architects.

Research support. Research is needed to develop technology for indoor noise diagnosis, mitigation and control. Efforts are also required to provide economical and practical alternatives for mitigation and control. Better means of measuring the effectiveness of absorption devices are needed; and diagnostic tools that are inexpensive and easy to use also need to be developed to help facility personnel. There is a particular need, too, for improving soundproofing methods, their implementation and for predicting the health effects of soundproofing techniques.

To provide accurate information for use in setting priorities for public health problems, governments should support problem assessment and surveys of indoor noise conditions. Building surveys are also necessary to provide baseline information about building characteristics and noise levels. When combined with occupant health surveys, these studies will help to establish the correlations between noise levels and adverse health effects. Surveys should be conducted to identify building types or vintages in which problems occur more frequently. The results of these studies will support effective risk reduction programmes. Epidemiological studies are also needed to aid in differentiating between noise-related symptoms and those due to other causes. Moreover, epidemiological studies are needed to assist in quantifying the extent of risk for indoor noise levels.

Economic research is needed to measure the costs of indoor noise control strategies to individuals, businesses and society. This includes developing methods for quantifying productivity loss and increased health costs due to noise, and for measuring the costs of various control strategies, including increased soundproofing and source control.

Development of standards and protocols. Efforts should be made to protect public health by setting reasonable noise exposure limits (immission standards) from known dose-response relationships. In cases where dose-response relationships have yet to be determined, but where
health effects are generally recognized, exposure limits should be set conservatively and take into account risk, economic impact and feasibility. Efforts should also be made to incorporate noise-related specifications into building codes. Areas to target with building codes include ventilation design, building envelope design, site preparation, materials selection and commissioning. Standards and other regulations governing the use of sound proofing materials should also be developed.

Individuals involved in the diagnosis and mitigation of indoor noise problems should be trained in the multidisciplinary nature of the noise field. By instituting a series of credentials that recognize and highlight areas of expertise, consumers would be provided with the information to make informed choices when procuring indoor noise services. Companies which provide such services should be officially accredited. Guidelines or standards for sound emissions of air-conditioners, power generators and other building devices, would also provide useful information for manufacturers, architects, design engineers, building managers and others who play a role in selecting products used indoors.

5.6.2. Design considerations

Site investigation. Potential sites should be evaluated to determine whether they are prone to indoor noise problems. This evaluation should be consistent with national and local land use planning guidelines. Sites should be investigated to determine past uses and whether any sources of sound remain as a result. The potential for outdoor noise being carried to the site from adjacent areas, such as busy streets, should also be evaluated.

Building design. Buildings should be designed to be soundproof, to improve control over indoor noise. Soundproofing requires that outside noise be prevented from entering the building, and this should be estimated as part of the architectural and engineering design process. When soundproofing for outdoor noise, the total indoor noise load and the desired quality of the indoor space should be considered. Adequate soundproofing against outdoor noise is important in residential as well as commercial properties, and should be re-evaluated when interior spaces are rebuilt or renovated.

Indoor Spaces. The architectural layout should aim to reduce noise and provide a good sound quality to the space. This would include designing indoor spaces to have sufficiently short reverberation times. Designers and contractors should be encouraged to use sound-absorbing materials that lead to lower indoor noise levels, and materials with the best sound-absorbing properties should be specified. However, use of these materials should not be the only solution (Harris 1991). Possible conflicts with other environmental demands should also be identified; for example, the special demands by allergic people.

5.6.3. Indoor noise level control

Building maintenance personnel should be trained to understand the indoor noise aspects of their work, and be aware of how their work can directly impact the health and comfort of occupants. Many maintenance activities directly affect indoor noise levels, and some may indicate potential problems. Preventive maintenance is essential for the building systems to operate correctly and
to provide suitable comfort conditions and low indoor noise levels. Detailed maintenance logs should be kept for all equipment. A schedule should be developed for routine equipment checks and calibration of control system components. Selection of low-noise domestic products should encouraged as far as is possible.

5.6.4. Resolving indoor noise problems

Addressing occupant complaints and symptoms. When complaints are received from occupants of a building, the cognizant authority should be responsive. The initial investigation into the cause of the complaint may be conducted by the in-house management staff, and they should continue an investigation as far as possible. If necessary, they should be responsible for hiring an outside consultant.

Building diagnostic procedures. After receiving complaints related to indoor noise levels, facility personnel or consultants should attempt to identify the cause of the problem through an iterative process of information collection and hypothesis testing. To begin, a walkthrough inspection of the building, including the affected areas and the mechanical systems serving these spaces is required. A walkthrough can provide information on the soundproofing system of the building, the sound pathways and sound sources. Visual indicators of sound sources and soundproofing malfunctions should be evaluated first. Symptom logs and schedules of building activities may provide enough additional information to resolve the problem.

If a walkthrough alone does not provide a solution, measurements of sound pressure levels at various locations should be taken, and indoor and ambient levels of noise pollution should be compared. As part of the investigation, the absorption characteristics of walls and ceilings should be evaluated. Sophisticated sampling methods may be necessary to provide proof of a problem to the building owner or other responsible party. The results may be used to confirm a hypothesis or ascertain the source of the indoor noise problem. Whenever a problem is discovered during the investigation, a remedy to the situation should be attempted and a determination made of whether the complaint has been resolved.

In some cases, it should be recognized that difficulties in interpreting the sampling results may exist. The costs of certain types of testing should also be taken into account. Simple, cost-effective screening methods should be developed to make sampling a more attractive option for both investigators and clients. Finally, it must be remembered that several factors cause symptoms similar to those induced by noise pollution. Examples include air pollutants, ergonomics, lighting, vibration and psychosocial factors. Consequently, any investigation of noise complaints should also evaluate non-noise factors.

5.7. Priority Setting in Noise Management

Priorities in noise management will differ between countries, according to policy objectives, needs and capabilities. Priority setting in noise management refers to prioritizing health risks and concentrating on the most important sources of noise. For effective noise management, the goals, policies and noise control schemes have to be defined. Goals for noise management include eliminating noise, or reducing noise to acceptable levels, and avoiding the adverse health
effects of noise on human health. Policies for noise management encompass laws and
regulations for setting noise standards and for ensuring compliance. The amount of information
to be included in low-noise implementation plans and the use of cost-benefit comparisons also
fall within the purview of noise management policies. Techniques for noise control include
source control, barriers in noise pathways and receiver protection. Adequate calculation models
for noise propagation, as well as programmes for noise monitoring, are part of an overall noise
control scheme.

As emphasized above, a framework for a political, regulatory and administrative approach is
required to guarantee the consistent and transparent promulgation of noise standards. This
ensures a sound and practical framework for risk-reducing measures and for the selection of
abatement strategies.

5.7.1. Noise policy and legislation

Noise is both a local and a global problem. Governments in every country have a responsibility
to set up policies and legislation for controlling community noise. There is a direct relationship
between the level of development in a country and the degree of noise pollution impacting its
people. As a society develops, it increases its level of urbanization and industrialization, and the
extent of its transportation system. Each of these developments brings an increase in noise load.
Without appropriate intervention the noise impact on communities will escalate (see Figure 5.3).
If governments implement only weak noise policies and regulations, they will not be able to
prevent a continuous increase in noise pollution and associated adverse health effects. Failure to
enforce strong regulations is ineffective in combating noise as well.
Figure 5.3. Relationship between noise regulation and impact with development (from Hede 1998b)

Policies for noise regulatory standards at the municipal, regional, national and supranational levels are usually determined by the legislatures. The regulatory standards adopted strongly depend on the risk management strategies of the legislatures, and can be influenced by sociopolitical considerations and/or international agreements. Although regulatory standards may be country specific, in general the following issues are taken into consideration:

a. Identification of the adverse public health effects that are to be avoided.

b. Identification of the population to be protected.

c. The type of parameters describing noise and the limit applicable to the parameters.

d. Applicable monitoring methodology and its quality assurance.

e. Enforcement procedures to achieve compliance with noise regulatory standards within a defined time frame.

f. Emission control measures and emission regulatory standards.

g. Immission standards (limits for sound pressure levels).

h. Identification of authorities responsible for enforcement.

i. Resource commitment.

Regulatory standards may be based solely on scientific and technical data showing the adverse effects of noise on public health. But other aspects are usually considered, either when setting standards or when designing appropriate noise abatement measures. These other aspects include the technological feasibility, costs of compliance, prevailing exposure levels, and the social,
economic and cultural conditions. Several standards may be set. For example, effect-oriented regulatory standards may be set as a long-term goal, while less-stringent standards are adopted for the short term. As a consequence, noise regulatory standards differ widely from country to country (WHO 1995a; Gottlob 1995).

Noise regulatory standards can set the reference point for emission control and abatement policies at the national, regional or municipal levels, and can thus strongly influence the implementation of noise control policies. In many countries, exceeding regulatory standards is linked to an obligation to develop abatement action plans at the municipal, regional or national levels (low-noise implementation plans). Such plans have to address all relevant sources of noise pollution.

### 5.7.2. Examples of noise policies

Different countries have adopted a range of policies and regulations for noise control. A number of these are outlined in this section as examples.

**Argentina.** In Argentina, a national law recently limited the daily 8-h exposure to industrial noise to 80 dB, and it has had beneficial effects on hearing impairment and other hearing disorders among workers. In general, industry has responded by introducing constant controls on noise sources, combined with hearing tests and medical follow-ups for workers. Factory owners have recruited permanent health and safety engineers who control noise, supply advice on how to make further improvements, and routinely assess excessive noise levels. The engineers also provide education in personal protection and in the correct use of ear plugs, mufflers etc.

At the municipal level two types of noise have been considered. Unnecessary noise, which is forbidden; and excessive noise, which is defined for neighbourhood activities (zones), and for which both day and night-time maximum limits have been introduced. The results have been relatively successful in mitigating unwanted noise effects. At the provincial level, similar results have been accomplished for many cities in Argentina and Latin America.

**Australia.** In Australia, the responsibility for noise control is shared primarily by state and local governments. There are nationally-agreed regulatory standards for airport planning and new vehicle noise emissions. The Australian Noise Exposure Forecast (ANEF) index is used to describe how much aircraft noise is received at locations around an airport (DoTRS 1999). Around all airports, planning controls restrict the construction of dwellings within the 25 ANEF exposure contour and require sound insulation for those within 20 ANEF. Road traffic noise limits are set by state governments, but vary considerably in both the exposure metric and in maximum allowable levels. New vehicles are required to comply with stringent design rules for noise and air emissions. For example, new regulation in New South Wales adopts L_Aeq as the metric and sets noise limits of 60 dBA for daytime, and 55 dBA for night-time, along new roads. Local governments set regulations restricting noise emissions for household equipment, such as air conditioners, and the hours of use for noisy machines such as lawn mowers.

**Europe.** In Europe, noise legislation is not generally enforced. As a result, environmental noise
levels are often higher than the legislated noise limits. Moreover, there is a gap between long-term political goals and what represents a "good acoustical environment". One reason for this gap is that noise pollution is most commonly regulated only for new land use or for the development of transportation systems, whereas enlargements at existing localities may be approved even though noise limits or guideline values are already surpassed (Gottlob 1995). A comprehensive overview of the noise situation in Europe is given in the Green Paper (EU 1996b), which was established to give noise abatement a higher priority in policy making. The Green Paper outlines a new framework for noise policy in Europe with the following options for future action:

a. Harmonizing the methods for assessing noise exposure, and encouraging the exchange of information among member states.

b. Establishing plans to reduce road traffic noise by applying newer technologies and fiscal instruments.

c. Paying more attention to railway noise in view of the future extension of rail networks.

d. Introducing more stringent regulation on air transport and using economic instruments to encourage compliance.

e. Simplifying the existing seven regulations on outdoor equipment by proposing a Framework Directive that covers a wider range of equipment, including construction machines and others.

Pakistan. In Pakistan, the Environmental Protection Agency is responsible for the control of air pollution nationwide. However, only recently have controls been enforced in Sindh in an attempt to raise public awareness and carry out administrative control on road vehicles producing noise (Zaidi, personal communication).

South Africa. In South Africa, noise control is three decades old. It began with codes of practice issued by the South African Bureau of Standards to address noise pollution in various sectors of the country (e.g. see SABS 1994 1996; and the contribution of Grond in Appendix 2). In 1989, the Environment Conservation Act made provision for the Minister of Environmental Affairs and Tourism to make regulations for noise, vibration and shock (DEAT 1989). These regulations were published in 1990 and local authorities could apply to the Minister to make them applicable in their areas. Later, the act was changed to make it obligatory for all authorities to apply the regulations. However, according to the new Constitution of South Africa of 1996, legislative responsibility for noise control rests exclusively with provincial and local authorities. The noise control regulations will apply to local authorities in South Africa as soon as they are published in the provinces. This will not only give local authorities the power to enforce the regulations, but also place an obligation on them to see that the regulations are enforced.

Thailand. In 1996, noise pollution regulations in Thailand stipulated that not more than 70 dBA LAeq,24h should be allowed in residential areas, and the maximum level of noise in industry
should be no more than 85 dBA Leq 8h (Prasansuk 1997).

**United States of America.** Environmental noise was not addressed as a national policy issue in the USA until the implementation of the Noise Control Act of 1972. This congressional act directed the US Environmental Protection Agency to publish scientific information about noise exposure and its effects, and to identify acceptable levels of noise exposure under various conditions. The Noise Control Act was supposed to protect the public health and well-being with an adequate margin of safety. This was accomplished in 1974 with the publication of the US EPA "Levels Document" (US EPA 1974). It addressed issues such as the use of sound descriptions to describe sound exposure, the identification of the most important human effects resulting from noise exposure, and the specification of noise exposure criteria for various effects. Subsequent to the publication of the US EPA "Levels Document", guidelines for conducting environmental impact analysis were developed (Finegold et al. 1998). The day-night average sound level was thus established as the predominant sound descriptor for most environmental noise exposure.

It is evident from these examples that noise policies and regulations vary considerably across countries and regions. Moves towards global noise policies need to be encouraged to ensure that the world population gains the maximum health benefits from new developments in noise control.

### 5.7.3. Noise emission standards have proven to be inadequate

Much of the progress towards solving the noise pollution problem has come from advanced technology, which in turn has come about mainly as a result of governmental regulations (e.g. OECD-ECMT 1995). So far, however, the introduction of noise emission standards for vehicles has had limited impact on exposure to transportation noise, especially from aircraft and road traffic noise (Sandberg 1995). In part, this is because changes in human behaviour (of polluters, planners and citizens) have tended to offset some of the gains made. For example, mitigation efforts such as developing quieter vehicles, moving people to less noise-exposed areas, improving traffic systems and direct noise abatement and control (sound insulation, barriers etc.), have been counteracted by increases in the number of roads and highways built, by the number of traffic movements, and by higher driving speeds and the number of kilometers driven (OECD 1991; OECD-ECMT 1995).

Traffic planning and correction policies may diminish the number of people exposed to the very high community noise levels (>70 dB LAeq), but the number exposed to moderately high levels (55-65 dB LAeq) continues to increase in industrialized countries (Stanners & Bordeau 1995). In developing countries, exposure to excessive sound pressure levels (>85 dB LAeq), not only from occupational noise but also from urban, environmental noise, is the major avoidable cause of permanent hearing impairment (Smith 1998). Such sound pressure levels can also be reached by leisure activities at concerts, discotheques, motor sports and shooting ranges; by music played back in headphones; and by impulse noises from toys and fireworks.

A substantial growth in air transport is also expected in the future. Over the next 10 years large international airports may have to accommodate a doubling in passenger movements. General
aviation noise at regional airports is also expected to increase (Large & House 1989). Although jet aircraft are expected to become less noisy due to regulation of noise emissions (ICAO 1993),
the number of passengers is expected to increase. Increased air traffic movement between 1980 and 1990 is considered to be the main reason for the average 22% increase in the number of people exposed to noise above 67 dB LAeq at German airports (OECD 1993).

5.7.4. Unsustainable trends in noise pollution future policy planning

A number of trends are expected to increase environmental noise pollution, and are considered to be unsustainable in the long term. The OECD (1991) identified the following factors to be of increasing importance in the future:

a. The expanding use of increasingly powerful sources of noise.

b. The wider geographical dispersion of noise sources, together with greater individual mobility and spread of leisure activities.

c. The increasing invasion of noise, particularly into the early morning, evenings and weekends.

d. The increasing public expectations that are closely linked to increases in incomes and in education levels.

Apart from these, increased noise pollution is also linked to systemic changes in business practices (OECD-ECMT 1995). By accepting a just-in-time concept in transportation, products and components are stored in heavy-duty vehicles on roads, instead of in warehouses; and workers are recruited as temporary consultants just in time for the work, instead of as long-term employees.

In addition, the OECD (1991) report forecasts:

a. A strengthening of present noise abatement policies and their applications.

b. A further sharpening of emission standards.

c. A co-ordination of noise abatement measures and transport planning, to specifically reduce mobility.

d. A co-ordination of noise abatement measures with urban planning.

Planners need to know the likely effects of introducing a new noise source, or of increasing the level of an existing source, on the noise pollution in a community. Policy makers, when considering applications for new developmental projects, must take into account maximum levels, continuous equivalent sound pressure levels of both the background and the new noise source, the frequency of noise occurrence and the operating times of major noise sources.
5.7.5. Analysis of the impact of environmental noise

The concept of an environmental noise impact analysis (ENIA) is central to the philosophy of managing environmental noise. An ENIA should be required before implementing any project that would significantly increase the level of environmental noise in a community (typically, greater than a 5dB increase). The first step in performing an ENIA is to develop a baseline description of the existing noise environment. Next, the expected level of noise from a new source is added to the baseline exposure level to produce the new overall noise level. If the new total noise level is expected to cause an unacceptable impact on human health, trade-off analyses should then be performed to assess the cost, technical feasibility, and community acceptance of noise mitigation measures. It is strongly recommended that countries develop standardized procedures for performing ENIAs (Finegold et al. 1998; SABS 1998).

Assessment of adverse health effects. In setting noise standards (for example on the basis of these guidelines), the adverse health effects from which the population is to be protected need to be defined. Health effects range from hearing impairment to sleep disturbance, speech interference to annoyance. The distinction between adverse and non-adverse effects sometimes poses considerable difficulties. Even the elaborate definition of an adverse health effect given in Chapter 3 incorporates significant subjectivity and uncertainty. More serious noise effects, such as hearing impairment or permanent threshold shift, are generally accepted as adverse. Consideration of health effects that are both temporary and reversible, or that involve functional changes with uncertain clinical significance, requires a judgement on whether these less-serious effects should be considered when deriving guideline values. Judgements as to the adversity of health effects may differ between countries, because of factors such as cultural backgrounds and different levels of health status.

Estimation of the population at risk. The population at risk is that part of the population in a given country or community that is exposed to enhanced levels of noise. Each population has sensitive groups or subpopulations that are at higher risk of developing health effects due to noise exposure. Sensitive groups include individuals impaired by concurrent diseases or other physiological limitations and those with specific characteristics that makes them more vulnerable to noise (e.g. premature babies; see the contribution of Zaidi in Appendix 2). The sensitive groups in a population may vary across countries due to differences in medical care, nutritional status, lifestyle and demographic factors, prevailing genetic factors, and whether endemic or debilitating diseases are prevalent.

Calculation of exposure-response relationships. In developing standards, regulators should consider the degree of uncertainty in the exposure-response relationships provided in the noise guidelines. Differences in the population structure (age, health status), climate (temperature, humidity) and geography (altitude, environment) can influence the prevalence and severity of noise-related health effects. In consequence, modified exposure-response relationships may need to be applied when setting noise standards.

Assessment of risks and their acceptability. In the absence of distinct thresholds for the onset of health effects, regulators must determine what constitutes an acceptable health risk for the population and select an appropriate noise standard to protect public health. This is also true in
cases where thresholds are present, but where it would not be feasible to adopt noise guidelines as standards because of economical and/or technical constraints. The acceptability of the risks involved, and hence the standards selected, will depend on several factors. These include the expected incidence and severity of the potential effects, the size of the population at risk, the perception of related risks, and the degree of scientific uncertainty that the effects will occur at any given noise level. For example, if it is suspected that a health effect is severe and the size of the population at risk is large, a more cautious approach would be appropriate than if the effect were less troubling, or if the population were smaller.

Again, the acceptability of risk may vary among countries because of differences in social norms, and the degree of adversity and risk perception by the general population and stakeholders. Risk acceptability is also influenced by how the risks associated with noise compare with risks from other pollution sources or human activities.

5.7.6. Cost-benefit analysis

In the derivation of noise standards from noise guidelines two different approaches for decision making can be applied. Decisions can be based purely on health, cultural and environmental consequences, with little weight to economic efficiency. This approach has the objective of reducing the risk of adverse noise effects to a socially acceptable level. The second approach is based on a formal cost-effectiveness, or cost-benefit analysis (CBA). The objective is to identify control actions that achieve the greatest net economic benefit, or are the most economically efficient. The development of noise standards should account for both extremes, and involve stakeholders and assure social equity to all the parties involved. It should also provide sufficient information to guarantee that stakeholders understand the scientific and economic consequences.

To determine the costs of control action, the abatement measures used to reduce emissions must be known. This is usually the case for direct measures at the source and these measures can be monetarized. Costs of action should include all costs of investment, operation and maintenance. It may not be possible to monetarize indirect measures, such as alternative traffic plans or change in behaviour of individuals.

The steps in a cost-benefit analysis include:

a. The identification and cost analysis of control action (such as emission abatement strategies and tactics).

b. An assessment of noise and population exposure, with and without the control action.

c. The identification of benefit categories, such as improved health and reduced property loss.

d. A comparison of the health effects, with and without control action.

e. A comparison of the estimated costs of control action with the benefits that accrue from such action.
f. A sensitivity and uncertainty analysis.

Action taken to reduce one pollutant may increase or decrease the concentration of other pollutants. These additional effects should be considered, as well as pollutant interactions that may lead to double counting of costs or benefits, or to disregarding some costly but necessary action. Due to different levels of knowledge about the costs of control action and health effects, there is a tendency to overestimate the cost of control action and underestimate the benefits.

CBA is a highly interdisciplinary task. Appropriately applied, it is a legitimate and useful way of providing information for managers who must make decisions that impact health. CBA is also an appropriate tool for drawing the attention of politicians to the benefits of noise control. In any case, however, a CBA should be peer-reviewed and never be used as the sole and overriding determinant of decisions.

5.7.7. Review of standard setting

The setting of standards should involve stakeholders at all levels (industry, local authorities, non-governmental organizations and the general public), and should strive for social equity or fairness to all parties involved. It should also provide sufficient information to guarantee that the scientific and economic consequences of the proposed standards are clearly understood by the stakeholders. The earlier that stakeholders are involved, the more likely is their co-operation. Transparency in moving from noise guidelines to noise standards helps to increase public acceptance of necessary measures. Raising public awareness of noise-induced health effects (changing of risk perception) also leads to a better understanding of the issues involved (risk communication) and serves to obtain public support for necessary control action, such as reducing vehicle emissions. Noise standards should be regularly reviewed, and revised as new scientific evidence emerges.

5.7.8. Enforcement of noise standards: Low-noise implementation plans

The main objective of enforcing noise standards is to achieve compliance with the standards. The instrument used to achieve this goal is a Low-Noise Implementation Plan (LNIP). The outline of such a plan should be defined in the regulatory policies and should use the tactical instruments discussed above. A typical low-noise implementation plan includes:

a. A description of the area to be regulated.

b. An emissions inventory.

c. A monitored or simulated inventory of noise levels.

d. A comparison of the plan with emissions and noise standards or guidelines.

e. An inventory of the health effects.
f. A causal analysis of the health effects and their attribution to individual sources.

g. An analysis of control measures and their costs.

h. An analysis of transportation and land-use planning.

i. Enforcement procedures.

j. An analysis of the effectiveness of the noise management procedures.

k. An analysis of resource commitment.

l. Projections for the future.

As the LNIP also addresses the effectiveness of noise control technologies and policies, it is very much in line with the Noise Control Assessment Programme (NCAP) proposed recently (Finegold et al. 1999).

5.8. Conclusions on Noise Management

Successful noise management should be based on the fundamental principles of precaution, the polluter pays and prevention. The noise abatement strategy typically starts with the development of noise standards or guidelines, and the identification, mapping and monitoring of noise sources and exposed communities. A powerful tool in developing and applying the control strategy is to make use of modeling. These models need to be validated by monitoring data. Noise parameters relevant to the important sources of noise must be known. Indoor noise exposures present specific and complex problems, but the general principles for noise management hold. The main means for noise control in buildings include careful site investigations, adequate building designs and building codes, effective means for addressing occupant complaints and symptoms, and building diagnostic procedures.

Noise control should include measures to limit the noise at the source, to control the sound transmission path, to protect the receiver’s site, to plan land use, and to raise public awareness. With careful planning, exposure to noise can be avoided or reduced. Control options should take into account the technical, financial, social, health and environmental factors of concern. Cost-benefit relationships, as well as the cost-effectiveness of the control measures, must be considered in the context of the social and financial situation of each country. A framework for a political, regulatory and administrative approach is required for the consistent and transparent promulgation of noise standards. Examples are given for some countries, which may guide others in their development of noise policies.

Noise management should:

a. Start monitoring human exposures to noise.

b. Have health control require mitigation of noise emissions. The mitigation procedures
should take into consideration specific environments such as schools, playgrounds, homes and hospitals; environments with multiple noise sources, or which may amplify the effects of noise; sensitive time periods, such as evenings, nights and holidays; and groups at high risk, such as children and the hearing impaired.

c. Consider noise consequences when making decisions on transport-system and land-use planning.

d. Introduce surveillance systems for noise-related adverse health effects.

e. Assess the effectiveness of noise policies in reducing noise exposure and related adverse health effects, and in improving supportive "soundscapes."

a. Adopt these Guidelines for Community Noise as long-term targets for improving human health.

g. Adopt precautionary actions for sustainable development of acoustical environments.
6. Conclusions And Recommendations

6.1. Implementation of the Guidelines

The potential health effects of community noise include hearing impairment; startle and defense reactions; aural pain; ear discomfort speech interference; sleep disturbance; cardiovascular effects; performance reduction; and annoyance responses. These health effects, in turn, can lead to social handicap; reduced productivity; decreased performance in learning; absenteeism in the workplace and school; increased drug use; and accidents. In addition to health effects of community noise, other impacts are important such as loss of property value. In these guidelines the international literature on the health effects of community noise was reviewed and used to derive guideline values for community noise. Besides the health effects of noise, the issues of noise assessment and noise management were also addressed. Other issues considered were priority setting in noise management; quality assurance plans; and the cost-efficiency of control actions. The aim of the guidelines is to protect populations from the adverse health impacts of noise.

The following recommendations were considered appropriate:

a. Governments should consider the protection of populations from community noise as an integral part of their policy for environmental protection.

b. Governments should consider implementing action plans with short-term, medium-term and long-term objectives for reducing noise levels.

c. Governments should adopt the health guidelines for community noise as targets to be achieved in the long-term.

d. Governments should include noise as an important issue when assessing public health matters and support more research related to the health effects of noise exposure.

f. Legislation should be enacted to reduce sound pressure levels, and existing legislation should be enforced.

g. Municipalities should develop low-noise implementation plans.

h. Cost-effectiveness and cost-benefit analyses should be considered as potential instruments when making management decisions.

i. Governments should support more policy-relevant research into noise pollution (see section 6.3).
6.2. Further WHO Work on Noise

The WHO Expert Task Force proposed several issues for future work in the field of community noise. These are:

a. The WHO should consider updating the guidelines on a regular basis.

b. The WHO should provide leadership and technical direction in defining future research priorities into noise.

c. The WHO should organize workshops on the application of the guidelines.

d. The WHO should provide leadership and co-ordinate international efforts to develop techniques for the design of supportive sound environments (e.g. 'soundscapes').

e. The WHO should provide leadership for programmes to assess the effectiveness of health-related noise policies and regulations.

f. The WHO should provide leadership and technical direction for the development of sound methodologies for EIAP and EHIAP.

g. The WHO should encourage further investigation into using noise exposure as an indicator of environmental deterioration, such as found in black spots in cities.

a. The WHO should provide leadership, technical support and advice to developing countries, to facilitate the development of noise policies and noise management.

6.3. Research Needs

In the publication entitled "Community Noise", examples of essential research and development needs were given (Berglund & Lindvall 1995). In part, the scientific community has already addressed these issues.

A major step forward in raising public awareness and that of decision makers is the recommendation of the present Expert Task Force to concentrate more on variables which have monetary consequences. This means that research should consider the dose-response relationships between sound pressure levels and politically relevant variables, such as noise-induced social handicap, reduced productivity, decreased performance in learning, workplace and school absenteeism, increased drug use and accidents.

There is also a need for continued efforts to understand community noise and its effects on the health of the world population. Below is a list of essential research needs in non-prioritized order. Research priorities may vary over time and by place and capabilities. The main goal in suggesting these research activities is to improve the scientific basis for policy-making and noise
management. This will protect and improve the public health with regard to the effects of community noise pollution.

Research related to measurement and monitoring systems for health effects

- Development of a global noise impact monitoring study. The study should be designed to obtain longitudinal data across countries on the health effects on communities of various types of environmental noise. A baseline survey could be undertaken in both developed and developing countries and monitoring surveys conducted every 3-5 years. Since a national map of noise exposure from all sources would be prohibitively expensive, periodic surveys of a representative sample of about 1000 people (using standard probability techniques) could be reliably generalized to the whole population of a country with an accuracy of plus-or-minus 3%. A small number of standard questions could be used across countries to obtain comparative data on the impact of all the main types of noise pollution.

- Development of continuous monitoring systems for direct health effects in critical locations.
- Development of standardized methods for low-cost assessment of local sound levels by measurement or model calculations.
- Development of instruments appropriate for local/regional surveys of people’s perceptions of their noise/sound environments.
- Protocols for reliable measurements of high-frequency hearing (8000 Hz and above) and for evaluation of such measures as early biomarkers for hearing impairment/deficits.

Research related to combined noise sources and combined health effects

- Research into the combined health effects of traffic noise, with emphasis on the distribution of sound levels over time and over population sub-environments (time-activity pattern).
- Comprehensive studies on combined noise sources and their combinations of health effects in the 3 large areas of transport (road, rail and aircraft).
- Procedures for evaluating the various health effects of complex combined noise exposures over 24 hours on vulnerable groups and on the general population.
- Methods for assessing the total health effect from noise immission (and also other pollution) in sensitive areas (for example, airports, city centers and heavily-trafficked highways)
Research related to direct and/or long-term health effects (sensitive risk groups, sensitive areas and combined exposures)

- Identification of potential risk groups, including identification of sensitive individuals (such as people with particular health problems; people dealing with complex cognitive tasks; the blind; the hearing impaired; young children and the elderly), differences between sexes, discrimination of risk among age groups, and influence of transportation noise on pregnancy course and on fetal development.

- Studies of dose-response relationships for various effects, and for continuous transportation noise at relatively low levels of exposure and low number of noise events per unit time (including traffic flow composition).

- Studies on the perception of control of noise exposure, genetic traits, coping strategies and noise annoyance as modifiers of the effects of noise on the cardiovascular system, and as causes of variability in individual responses to noise.

- Prospective longitudinal studies of transportation noise that examine physiological measures of health, including standardized health status inventory, blood pressure, neuro-endocrine and immune function.

- Knowledge on the health effects of low-frequency components in noise and vibration.

Research related to indirect or after-effects of noise exposure

- Field studies on the effects of exposure to specific sounds such as aircraft noise and loud music, including effects such as noise-induced temporary and permanent threshold shifts, speech perception and misperception, tinnitus and information retrieval.

- Studies on the influence of noise-induced sleep disturbance on health, work performance, accident risk and social life.

- Assessment of dose-response relationships between sound levels and politically relevant variables such as noise-induced social handicap, reduced productivity, decreased performance in learning, workplace and school absenteeism, increased drug use and accidents.

- Determination of the causal connection between noise and mental health effects, annoyance and (spontaneous) complaints in areas such as around large airports, heavy-trafficked highways, high-speed rail tracks and heavy vehicles transit routes. The connections could be examined by longitudinal studies, for example.

- Studies on the impact of traffic noise on recovery from noise-related stress, or from nervous system hyperactivity due to work and other noise exposures.
Research on the efficiency of noise abatement policies which are health based

- Determination of the accuracy and effectiveness of modern sound insulation (active noise absorption), especially in residential buildings, in reducing the long-term effects of noise on annoyance/sleep disturbance/speech intelligibility. This can be accomplished by studying sites that provide data on remedial activities and changes in behavioral patterns among occupants.

- Evaluation of environmental (area layout, architecture) and traffic planning (e.g. rerouting) interventions on annoyance, speech interference and sleep disturbance.

- Comparative studies to determine whether children and the hearing impaired have equitable access to healthier lives when compared with normal adults in noise-exposed areas.

- Development of a methodology for the environmental health impact assessment of noise that is applicable in developing as well as developed countries.

Research into positive acoustical needs of the general population and vulnerable groups

- Development of techniques/protocols for the design of supportive acoustical environments for the general population and for vulnerable groups. The protocols should take into account time periods that are sensitive from physiological, psychological and socio-cultural perspectives.

- Studies to characterize good "restoration areas" which provide the possibility for rest without adverse noise load.

- Studies to assess the effectiveness of noise policies in maintaining and improving soundscapes and reducing human exposures.
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Appendix 2: Examples Of Regional Noise Situations

REGION OF THE AMERICAS

Latin America (Guillermo Fuchs, Argentina).

As more and more cities in Latin America surpass the 20 million inhabitants mark, the noise pollution situation will continue to deteriorate. Most noise pollution in Latin American cities comes from traffic, industry, domestic situations and from the community. Traffic is the main source of outdoor noise in most big cities. The increase in automobile engine power and lack of adequate silencing results in L\text{Aeq} street levels $>$70 dB, above acceptable limits. Vehicle noise has strong low-frequency peaks at $\approx$13 Hz, and at driving speeds of 100 Km/h noise levels can exceed 100 dB. The low-frequency (LF) noise is aerodynamic in origin produced, for example, by driving with the car windows open. Little can be done to mitigate these low-frequency noises, except to drive with all the windows closed. Noise exposure due to leisure activities such as carting, motor racing and Walkman use is also growing at a fast rate. Walkman use in the street not only contributes to temporary threshold shifts (TTS) in hearing, but also endangers the user because they may not hear warning signals. Construction sites, pavement repairs and advertiseemenes also contribute to street noise, and noise levels of 85–100 dB are common.

The Centro de Investigaciones Acústicas y Luminotécnicas (CIAL) in Córdoba, Argentina has investigated noise pollution in both the field and in the laboratory. The most noticeable effect of excessive urban noise is hearing impairment, but other psychophysiological effects also result. For example, tinnitus resulting from sudden or continuous noise bursts, can produce a TTS of 20–30 dB, and prolonged exposures can result in permanent threshold shifts (PTS). By analyzing sound spectra down to a few Hertz, and at levels of up to 120 dB, discrete frequencies and bands of infrasound were found which damage hearing. With LF sounds at levels of 120 dB, TTS resulted after brief exposure, and PTS after only 30 min of exposure. The effects of noise on hearing can be especially detrimental to children in schools located downtown. Field studies in Córdoba city schools located near streets with high traffic density showed that speech intelligibility was dramatically degraded in classrooms that did not meet international acoustical standards. This is a particularly worrying problem for the younger students, who are in the process of language acquisition, and interferes with their learning process.

In general, community noise in Latin America remains above accepted limits. Particularly at night, sleep and rest are affected by transient noise signals from electronically amplified sounds, music and propaganda. Field research was carried out in four zones of Buenos Aires, to determine the effects of urban noise on the well-being, health and activities of the inhabitants. The effects of confounding variables were taken into consideration. It was concluded that nighttime noise levels in downtown Buenos Aires were barely lower than daytime levels. The results showed that sleep, concentration, communication and well-being were affected in most people when noise levels exceeded those permitted by international laws. The reactions of the inhabitants to protect themselves from the effects of noise varied, and included changing rooms, closing windows and complaining to authorities.
Individual responses to noise also vary, and depend on factors such as social, educational and economic levels, individual sensibility, attitudes towards noise, satisfaction with home or neighborhood, and cognitive and affective parameters. For example, at CIAL, two pilot studies were carried out with a group of adolescents to determine the influence of environmental conditions on the perception of noise. When music was played at very high sound levels (with sound peaks of 119 dBA) in a discotheque, judged to be a pleasant environment, the subjects showed less TTS than when exposed to the same music in the laboratory, which was considered to be an unpleasant environment.

At the municipal level Argentinean Ordinances consider two types of noises: unnecessary and excessive. Unnecessary noises are forbidden. Excessive noises are classified according to neighboring activities and are limited by maximum levels allowed for daytime (7 am to 10 pm) and night-time (10 pm to 7 am). This regulation has been relatively successful, but control has to be continuous. Similar actions have been prescribed at the provincial level in many cities of Argentina and Latin America. Control efforts aimed at reducing noise levels from individual vehicles are showing reasonably good improvements. However, many efforts of municipal authorities to mitigate noise pollution have failed because of economic, political and other pressures. For example, although noise control for automobiles has shown some improvement, efforts have been counteracted by the growth in the number and power of automobiles.

CIAL has designed both static and dynamic tests that can be used to set annual noise control limits. For roads and freeways where permitted speeds are above 80 Km/h, CIAL has also designed barriers which protect buildings lining the freeways. Considerable improvements have been obtained using these barriers with noise reductions of over 20 dB at buildings fronts. The most common types of barrier are concrete slabs or wooden structures, made translucent or covered with vegetation. Planted vegetation does not act as an efficient noise shield for freeway noise, except in cases of thick forest strips. In several cities, CIAL also designed ring roads to avoid heavy traffic along sensitive areas such as hospitals, schools and laboratories.

Efforts have not been successful in reducing the noise pollution from popular sports such as karting, motorboating and motocross, where noise levels can exceed 100 dB. In part, this is because individuals do not believe these activities can result in hearing impairment or have other detrimental effects, in spite of the scientific evidence. Argentinean and other Latin American authorities also have not been successful in reducing the sound levels from music centres, such as discotheques, where sound levels can exceed 100 dB between 11 pm and 6 am. However, public protest is increasing and municipal authorities have been applying some control. For instance, in big cities, discotheque owners and others are beginning to seek advice on how to isolate their businesses from apartment buildings and residential areas. Some improvements have been observed, but accepted limits have not yet been generally attained.
United States of America (Larry Finegold)

Noise Exposure.

In the United States, there have only been a few major attempts to describe broad environmental noise exposures. Early estimates for the average daily exposure of various population groups were reported in the U.S. Environmental Protection Agency's *Levels Document* (US EPA 1974), but these were only partially verified by subsequent large-scale measurements. Another EPA publication the same year provided estimates of the national population distribution as a function of outdoor noise level, and established population density as the primary predictor of a community's noise exposure (Galloway et al. 1974). Methodological issues that need be considered when measuring community noise, including both temporal and geographic sampling techniques, have been addressed by Eldred (1975). This paper also provided early quantitative estimates of noise exposure at a variety of sites, from an isolated spot on the North rim of the Grand Canyon to a spot in downtown Harlem in New York City. Another nationwide survey focused on exposure to everyday urban noises, rather than the more traditional approach of measuring exposure to high-level transportation noise from aircraft, traffic and rail (Fidell 1978). This study included noise exposure and human response data from over 2 000 participants at 24 sites.

A comprehensive report, *Noise In America: The Extent of the Problem*, included estimates of occupational noise exposure in the US in standard industrial classification categories (Bolt, Beranek & Newman, Inc. 1981). A more recent paper reviewed the long-term trends of noise exposure in the US and its impact over a 30-year time span, starting in the early 1970's. The focus was primarily on motor vehicle and aircraft noise, and the prediction was for steadily decreasing population-weighted day-night sound exposure (Eldred 1988). However, it remains to be seen whether the technological improvements in noise emission, such as changing from Chapter 2 to Chapter 3 aircraft, will be offset in the long run by the larger carriers and increased operations levels that are forecast for all transportation modes. Although never implemented in its entirety, a comprehensive plan for measuring community environmental noise and associated human responses was proposed over 25 years ago in the US (Sutherland et al. 1973).

Environmental Noise Policy in the United States

One of the first major breakthroughs in developing an environmental noise policy in the United States occurred in 1969 with the adoption of the National Environmental Policy Act (NEPA). This Congressional Act mandated that the environmental effects of any major development project be assessed if federal funds were involved in the project. Through the Noise Control Act (NCA) of 1972, the U.S. Congress directed the US Environmental Protection Agency (EPA) to publish scientific information about the kind and extent of all identifiable effects of different qualities and quantities of noise. The US EPA was also requested to define acceptable noise levels under various conditions that would protect the public health and welfare with an adequate margin of safety. To accomplish this objective, the 1974 US EPA *Levels Document* formally introduced prescribed noise descriptors and prescribed levels of environmental noise exposure. Along with its companion document, *Guidelines for Preparing Environmental Impact Statements on Noise*, which was published by the U.S. National Research Council in 1977, the
Levels Document has been the mainstay of U.S. environmental noise policy for nearly a quarter of a century. These documents were supplemented by additional Public Laws, Presidential Executive Orders, and many-tiered noise exposure guidelines, regulations, and Standards. Important examples include Guidelines for Considering Noise in Land Use Planning and Control, published in 1980 by the US Federal Interagency Committee on Urban Noise; and Guidelines for Noise Impact Analysis, published in 1982 by the US EPA.

One of the distinctive features of the US EPA Levels Document is that it does not establish regulatory goals. This is because the noise exposure levels identified in this document were determined by a negotiated scientific consensus and were chosen without concern for their economic and technological feasibility; they also included an additional margin of safety. For these reasons, an A-weighted Day-Night Average Sound Level (DNL) of 55 dB was selected in the Levels Document as that required to totally protect against outdoor activity interference and annoyance. Land use planning guidelines developed since its publication allow for an outdoor DNL exposure in non-sensitive areas of up to 65 dB before sound insulation or other noise mitigation measures must be implemented. Thus, separation of short-, medium- and long-term goals allow noise-exposure goals to be established that are based on human effects research data, yet still allow for the financial and technological constraints within which all countries must work.

The US EPA’s Office of Noise Abatement and Control (ONAC) provided a considerable amount of impetus to the development of environmental noise policies for about a decade in the US. During this time, several major US federal agencies, including the US EPA, the Department of Transportation, the Federal Aviation Administration, the Department of Housing and Urban Development, the National Aeronautics and Space Administration, the Department of Defense, and the Federal Interagency Committee on Noise have all published important documents addressing environmental noise and its effects on people. Lack of funding, however, has made the EPA ONAC largely ineffective in the past decade. A new bill, the Quiet Communities Act has recently been introduced in the U.S. Congress to re-enact and fund this office (House of Representatives Bill, H.R. 536). However, the passage of this bill is uncertain, because noise in the US, as in Europe, has not received the attention that other environmental issues have, such as air and water quality.

In the USA there is growing debate over whether to continue to rely on the use of DNL (and the A-Weighted Equivalent Continuous Sound Pressure Level upon which DNL is based) as the primary environmental noise exposure metric, or whether to supplement it with other noise descriptors. Because a growing number of researchers believe that “Sound Exposure” is more understandable to the public, the American National Standards Institute has prepared a new Standard, which allows the equivalent use of either DNL or Sound Exposure (ANSI 1996). The primary purpose of this new standard, however, is to provide a methodology for modeling the Combined or Total Noise Environment, by making numerical adjustments to the exposure levels from various noise sources before assessing their predicted impacts on people. A companion standard (ANSI 1998) links DNL and Sound Exposure with the current USA land use planning table. The latter is currently being updated by a team of people from various federal government agencies and when completed should improve the capabilities of environmental and community land-use planners. These documents will complement the newly revised ANSI standard on
acoustical terminology (ANSI 1994).

To summarize progress in noise control made in the USA in the nearly 25 years since the initial national environmental noise policy documents were written, the Acoustical Society of America held a special session in Washington, D.C. in 1995. The papers presented in this special session were then published as a collaborative effort between the Acoustical Society of America and the Institute of Noise Control Engineering (von Gierke & Johnson 1996). This document is available from the Acoustical Society of America, as are a wide range of standards related to various environmental noise and bioacoustics topics from the ANSI.

A document from the European Union is now also available, which includes guidelines for addressing noise in environmental assessments (EU 1996). Policy documents from organizations such as ISO, CEN, and ICAO have shown that international cooperation is quite possible in the environmental noise arena. The ISO document, entitled Acoustics - Description and Measurement of Environmental Noise (ISO 1996), and other international standards have already proven themselves to be invaluable in moving towards the development of a harmonized environmental noise policy. The best way to move forward in developing a harmonized environmental noise policy is to take a look at the various national policies that have already been adopted in many countries, including those both from the European member states and from the USA, and to decide what improvements need to be made to the existing policy documents. A solid understanding of the progress that has already been achieved around the world would obviously provide the foundation for the development of future noise policies.

Implementation Concepts and Tools

Development of appropriate policies, regulations, and standards, particularly in the noise measurement and impact assessment areas, is a necessary foundation for implementing effective noise abatement policies and noise control programs. A well-trained cadre of environmental planners will be needed in the future to perform land-use planning and environmental impact analysis. These professionals will require both a new generation of standardized noise propagation models to deal with the Total Noise Environment, as well as sophisticated computer-based impact analysis and land-use planning tools.

A more thorough description of the current noise environment in major cities, suburbs, and rural areas is needed to support the noise policy development process. A new generation of noise measurement and monitoring systems, along with standards related to their use, are already providing considerable improvement in our ability to accurately describe complex noise environments. Finally, both active and passive noise control technologies, and other noise mitigation techniques, are rapidly becoming available for addressing local noise problems. Combined with a strong public awareness and education program, land-use planning and noise abatement efforts certainly have the potential to provide us with an environment with acceptable levels of noise exposure.

References
AFRICAN REGION

South Africa (Etienne Grond, South Africa)

Introduction

Cultural and developmental levels diverge greatly in South Africa, and the country can be divided into a first world sector, a developing sector and a third world sector. This contributes to huge variations in both the awareness of noise pollution and in population exposure to noise pollution. Noise-related health problems will in all probability show the same large variations.

Legal requirements

Noise control in South Africa has a history dating back about three decades. Noise control began with codes of practice issued by the South African Bureau of Standards (SABS) to address noise pollution in different sectors. Since then, Section 25 of the Environment Conservation Act (Act 73 of 1989) made provision for the Minister of Environmental Affairs and Tourism to regulate noise, vibration and shock at the national level. These regulations were published in 1990 and local authorities could apply to the Minister to make them applicable in their areas of jurisdiction. However, a number of the bigger local authorities did not apply for the regulations since they already had by-laws in place, which they felt were sufficient. By the middle of 1992 only 29 local authorities had applied the regulations and so the act was changed to make it obligatory for all authorities to apply the regulations. However, by the time the regulations were ready to be published, the new Constitution of South Africa came into effect and this listed noise control as an exclusive legislative competence of provincial and local authorities. This meant that the national government could not publish the regulations. However, provincial governments have agreed to publish the regulations in their respective areas. The regulations will apply to all local authorities as soon as they are published in the provinces, and will give local authorities both the power and the obligation to enforce the regulations.

The Department of Environmental Affairs and Tourism also published regulations during 1997 to make Environmental Impact Assessments mandatory for most new developments, as well as for changes in existing developments. This means that any impact that a development might have on its surrounding environment must be evaluated and, where necessary, the impact must be mitigated to acceptable levels. The noise control regulations also state that a local authority may declare a “controlled area,” which is an area where the average noise level exceeds 65 dBA over a period of 24 h period. This means that educational and residential buildings, hospitals and churches may not be situated within such areas.

Occupational noise exposure is regulated by the Department of Manpower, under the Occupational Health and Safety Act (Act 85 of 1993). These regulations states that workers may not be exposed to noise levels of higher than 85 dBA and that those exposed to such levels must make use of equipment to protect their hearing. The problem, however, is that most workers tend not to make use of the provided equipment, either because the equipment is not comfortable, or because they are not aware of the risks high noise levels pose to their hearing. A further problem is that small industries often do not supply the workers with the necessary
equipment, or supply inferior equipment that is less costly.

**Codes of practice**

The codes of practice issued by the SABS were for the most part replaced by IEC (International Electrotechnical Commission) standards and adopted as SABS ISO codes of practice. They are still being used in South Africa and are regularly updated. A relevant list can be found in the references. The SABS has also published a number of recommended practices (ARP). These include the ARP 020: “Sound impact investigations for integrated environmental management” that is currently being upgraded to a code of practice. Such codes of practice can be referred to as requirements in legislation and will be known as SABS 0328: “Methods for environmental noise impact assessments.” The codes of practice published in South Africa cover hearing protection; measurement of noise; occupational noise; environmental noise; airplane noise; and building acoustics, etc.

**Courses**

Local authorities responsible for applying regulations published by the Department of Environmental Affairs and Tourism must employ a noise control officer who has at least three years tertiary education in engineering, physical sciences or health sciences, and who is registered with a professional council. Alternatively, a consultant with similar training may be employed. Most of the universities in South Africa provide the relevant training, with at least part of the training in acoustics. Universities and technical colleges also provide a number of special acoustics courses. Over the last couple of years awareness of environmental conservation has expanded dramatically within the academic community, and most universities and colleges now have degree courses in environmental management. At the very least, these courses include a six-month module in acoustics, and usually also include training in basic mathematics; the physics of sound; sound measuring methodologies; and noise pollution.

**Community awareness and exposure to noise pollution**

This topic should be discussed with respect to three separate population sectors: the first-world sector (developed), the developing sector and the third-world sector (rural).

**Developed sector**

This sector of the population is more-or-less as developed as their European and American counterparts. They have been exposed to noise pollution for a considerable time and, for the most part, are aware of the health consequences of high noise levels. People in this group are also aware of the existence of legal measures by which noise pollution can be addressed. Not surprisingly, most of the complaints and legal action regarding noise pollution are received from this group. Information about noise-related health problems is very limited, but because this group is highly aware of the risks posed by high noise levels, future studies will probably show that people in this category have the fewest health problems. The majority of people in this group are less exposed to high noise levels at work, and they live in more affluent neighborhoods with large plots and separating walls. Their houses tend to be built with materials that are noise
reducing. They also live further away from major noise-producing activities, such as highways, airports and large industries.

**Developing sector**

This sector of the population has the greatest exposure to high noise levels, both at home and in the workplace. Overall, they are relatively poor and cannot afford to live in quiet areas, or afford large plots or solid building materials. A large component of this sector resides in squatter communities where building are made of any material available, from plastic to corrugated sheets and wood. The buildings are right next to each other and there is almost no noise attenuation between residencies.

People in this category usually live close to major access routes into the cities, because they make use of public transportation and taxis to get to their places of work. Often, too, they live close to their places of work, which are usually big industries with relatively high levels of noise pollution. These people usually work in high noise areas, and because of their lack of awareness of the effects of high noise levels, often do not make use of available hearing protection equipment. Because of a lack of funds, these people also cannot get out of high noise areas and go to recreational areas for relaxation and lower noise levels. Not much information is available on the adverse health problems in this sector. However, workers in this sector should undergo regular medical examinations and the results can be obtained from the industries involved.

**Rural sector**

As the name suggests, people in this sector live in rural surroundings and for the most part are not subjected to noise levels that could be detrimental to their health. However, they are almost totally unaware of the risks posed by high noise levels. Some of these people work on farms and work with machinery that emits relatively high noise levels, but because of their lack of awareness they do not make use of hearing protection equipment. One advantage they do have is that they return to homes in quiet surroundings and their hearing has a chance to recover. To date, no studies have been carried out to determine the state of their hearing and it would be impossible to state that they have no health problems related to high noise levels.

**References**


Relevant SABS codes of practice:


SABS 0103-1994. The measurement and rating of environmental noise with respect to annoyance and speech communication (third revision).
SABS 0115-1974. The measurement of noise and the determination of disturbance from aeroplanes for certification purposes.

SABS 0117-1974. The determination and limitation of disturbance around an aerodrome due to noise from aeroplanes (Amendment no 1 - 1984).


ARP 020-1992. Sound impact investigations for integrated environmental management. (To be superseded and replaced by SABS 0328: Methods for environmental noise impact assessments).
EASTERN MEDITERRANEAN REGION (Shabih H. Zaidi)

Scope

In the Eastern Mediterranean region some countries have highly developed industries, while others have none. In other cases, the agricultural economy is inseparably mixed with high-technology industries, such as the oil industry, which can be seen in nearly the whole of the Arabian Peninsula. Other examples of where agriculture and industry are intertwined can be seen in Pakistan, Jordan and Egypt. The main focus of this paper is community noise, but because industry is so widely distributed, some discussion of industrial noise is inevitable. The scope of this paper is to document the available scientific data on community noise in the WHO Regional Office of the Eastern Mediterranean (EMRO) region, including preventive strategies, legislation, compensation and future trends.

Sources of Noise Pollution

Sources of noise pollution in the Eastern Mediterranean region include noise from transportation, social and religious activities, building and civil works, roadside workshops, mechanical floor shops and others. During civil works and building booms, noise levels in all countries of the Eastern Mediterranean region could easily reach 85dBA during the daytime over an 8 h work period. In Pakistan, unprotected construction work goes on at all times of the day and night and uses outdated machinery; and the noise is compounded by workers shouting. On a typical building site noise levels reach 90–100 dBA.

In Karachi, the main artery for daily commuters is a long road that terminates at the harbor. In the densest area of this road there are a hundred small and large mechanical workshops, garages, metal sheet workers, dent removers, painters, welders and repair shops, all of which create a variety of noises. In the middle of this area at the Tibet Centre the L.Aeq,8h is 90dBA (Zaidi 1989). A similar picture is seen elsewhere in cities like Lahore, Peshawar, etc. Fortunately, the same is not true for other newly built cities in the EMRO region, such as Dubai, or Tripoli, where strict rules separate industrial zones from residential areas.

A special noise problem is Karachi harbour. This port serves the whole of Pakistan as well as Afghanistan and several Asian states, such as Kyrgyzstan, Kazakhstan and Uzbekistan. The noise level at the main wharf of Karachi Port ranges between 90–110 dBA on any given day. Other special sources of noise are the Eastern Mediterranean airports, and indeed most of the airports in the Middle East. Most northbound air traffic originates in Pakistan, Dubai, Sharjah etc. and flights usually depart after midnight so as to arrive in Europe during the daytime. A study is currently underway in Karachi to identify the damage caused by these nocturnal flights to those living under the flight path (SH Zaidi, GH Shaikh & AN Zaidi, personal communication).

Sadly, violence has become part of Eastern culture and is a significant source of noise pollution. Wars generate a lot of noise, and although noise-induced hearing loss is a secondary issue compared with the killing, after the wars many people are hearing impaired. This has been seen following conflicts in Balochistan, Peshawar and Afghanistan, where perforated ear drums,
profound hearing loss and stress-related psychosomatic illnesses are common in the refugee camps. The noise levels during a recent mass demonstration in Karachi, which included the firing of automatic weapons, reached 120 dBA at a distance of 50 m from the scene.

The Effects of Noise on Health

There is good evidence that environmental noise causes a range of health effects, including hearing loss, annoyance, cardiovascular changes, sleep disturbance and psychological effects. Although the health effects of noise pollution have not been documented for the entire EMRO region, data are available for Pakistan and can be used to illustrate the general problem. In this report, noise exposure is mainly expressed as L\text{Aeq},24h values.

Noise-induced hearing loss (NIHL).

It is believed that exposure to environmental noise in the EMRO countries is directly related to the living habits, economic prosperity and outdoor habits of people. It has been estimated that no more than 5% of the people are exposed to environmental sound levels in excess of 65dBA over a 24-h period. Similarly, for indoor noise, it is believed that the average family is not exposed to sound levels in excess of 70 dBA over a 24-h period. However, it is difficult to generalize for all countries in the EMRO region, because of ancient living styles and different cultural practices, such as taking siestas between 13:00–16:00 and stopping work at 20:00.

Exposure to noise while travelling to schools, offices or workplaces may vary tremendously between cities in the region. In Karachi, for example, traffic flow is undisciplined, erratic and irrational, with L\text{Aeq},8h values of 80–85 dBA. In Riyadh, by contrast, traffic flow is orderly with L\text{Aeq} levels of 70 dBA during a normal working day. In Karachi, noise levels show significant diurnal variation, reaching levels in excess of 140 dB during the peak rush hour at around 5.00 p.m. (Zaidi 1989). At the Tibet Centre, located at a busy downtown junction, noise levels were 60–70 dB at 9 am, but reached levels in excess of 140 dB between 5-7 p.m. A study conducted on a day that transportation workers went on strike established that road traffic is the most significant source of noise pollution in this city: in the absence of buses, rickshaws, trucks and other public vehicles the L\text{Aeq} level declined from 90dB to 75dB (Zaidi 1990). Motor engines, horns, loud music on public buses and rickshaws generate at least 65% of the noise in Karachi (Zaidi 1997; Shams 1997). Rickshaws can produce noise levels of 100–110 dBA and do not have silencers. On festive occasions, such as national holidays or political rallies, motorbikes running at high speeds along the Clifton beach in Karachi easily make noise exceeding 120 dBA. (Zaidi 1996).

Another study conducted at 14 different sites in Karachi showed that, in 11 of the sites, the average noise level ranged between 79–80 dB (Bosan & Zaidi 1995). The maximum noise levels at all these sites exceeded 100 dB. Speech interference, measured by the Preferred Speech Interference Level and the Articulation Index, was significant (Shaikh & Rizvi 1990). The study results indicated that two people facing each other at a distance of 1.2 m would have to shout to be intelligible; and the Articulation Indexes demonstrated that communication was unsatisfactory. Of perhaps greater concern are the results of a survey of 587 males between the ages of 17 and 45 years old, who worked as shopkeepers, vehicle drivers, builders and office
assistants. Audiograms showed that 14.6% of the subjects had significant hearing impairment at 3 000–4 000 Hertz (Hasan et al., 2000).

Noise pollution from leisure activities can vary from country to country in the EMRO region. The Panthans in northern Pakistan, for example, like to shoot in the air on festive occasions, such as weddings, without using any noise protection devices. A minimum of 1 000 shots are fired on such occasions; and at a traditional tribal dance called the ‘Khattak’ the noise level recorded during a particularly enthralling performance in a sports arena was 120dBA. The hunting of wild boar is a common sport in the hinterlands of Sindh. With the rifle shots and the noise made by the beaters, noise levels can easily reach 110–120 dBA. In some EMRO countries, the younger crowd has taken up the Western habit of listening to Pop music for many hours. Discos and floorshows are confined to a few countries, such as Egypt. Open-air concerts are usually held in stadiums. The noise level recorded at a particularly popular concert was 130 dBA at a distance of 20 m from the stage and 35 m from the amplifiers.

In a study of road traffic at 25 different sites in Peshawar, the third most populous city in Pakistan, 90 traffic constables were taken as cohorts to investigate the extent of NIHL. Of these, 50 did not have any previous history of noise exposure and were taken as controls. Detailed evaluation and audiological investigations established that constables exposed to a noise level of 90 dBA for 8 hours every day suffered from NIHL. Compared to the control subjects, the constables had significant hearing impairment at 3 000 Hz, measured by Pure Tone Audiometry (Akhter 1996).

A similar study of traffic constables in Karachi showed that 82.8% of the constables suffered from NIHL (Itrat & Zaidi 1999). The study also showed that 33.3% of rickshaw drivers, and 56.9% of shopkeepers who worked in noisy bazaars, had hearing impairment. If these findings can be extrapolated to the total populations, there are 1 566 traffic constables (out of a total of 1 890 constables), and 4 067 rickshaw drivers (out of a total of 12 202 drivers) who suffer from NIHL. As has been reported by other researchers, the study also found evidence of acclimatization in the subjects: following an initial, rapid decline, hearing loss stabilized after prolonged noise exposure.

**Annoyance.**

The citizens of Karachi commonly complain that noise causes irritability and stress. The main sources have been identified as traffic noise, industrial noise and noise generated by human activity. Unfortunately no data are available for the level of annoyance caused by noise exposure in the EMRO region. From limited research around the world, it can be estimated that 35–40% of employees in office buildings are seriously annoyed by noise at sound levels in excess of 55–60 dBA. In countries such as Pakistan, Iran, Jordan and Egypt that level is often seen in most offices. Annoyance is a non-tangible entity and cannot be quantified scientifically. It is a human reaction and perhaps its parameters could include irritability, apprehension, fear, anger, frustration, uneasiness, apathy, chaos and confusion. If such are the parameters, then on a scale of 0–10, with 10 being the greatest annoyance, many EMRO countries could easily score 6 or higher.
Effects of noise on sleep and the cardiovascular system.

In the Eastern Mediterranean region no specific data are available on the effects of noise on sleep or the cardiovascular system. However, factory workers, traffic constables, rickshaw drivers and shopkeepers frequently complain about fatigue, irritability and headaches; and one of the most common causes of poor performance in offices is sleep disturbance. The rising incidence of tinnitus in cities like Karachi is also related to noise exposure, and tinnitus itself can lead to sleep deprivation. Although the effects of noise on the cardiovascular system have been well documented for other countries (Berglund & Lindvall 1995), data are lacking for the EMRO region. However, the prevalence of cardiovascular diseases are on the rise in the EMRO countries, particularly hypertension. While most of the increase in these diseases is due to a rich diet and lack of exercise, the relationship between noise and cardiovascular changes is worth investigating.

The risk to unborn babies and newborns.

Although evidence from other countries indicates that noise may damage the hearing of a fetus, there are no data from the EMRO countries to confirm this. With newborn babies, however, noise from incubators is a major cause of hearing loss in the EMRO region, particularly as 20–27% of them are born underweight (Razi et al. 1995). Once exposed to noise in an incubator, the chances of hearing impairment rapidly rises compared with cohorts in developed countries. Several other factors have also been identified as causing deafness and hearing impairment in newborns in the Eastern Mediterranean region (Zaidi 1998; Zakzouk et al. 1994). They are:

a. Discharge from the ears.

b. Communicable infections.

c. Ototoxicity.

d. Noise.

e. Consanguinity.

f. Iodine deficiency.

Noise Control

Although noise control legislation exists in several EMRO countries, it is seldom enforced, particularly in Pakistan and some neighboring countries. Noise control begins with education, public awareness and the appropriate use of media in highlighting the effects of noise. In Calcutta, for instance, public orientation and mass media mobilization have produced tangible results, and this can easily be done in other countries. Three strategies have been devised for noise control, all of which are practicable in EMRO region countries. They are control at the source, control along the path and control at the receiving end.
There are many ways noise can be controlled at the source. For example, most of the equipment and machinery used in EMRO countries is imported from the West. Noise control could begin by importing quieter machinery, built with newer materials like ceramics or frictionless parts. And at the local level, the timely replacement of parts and proper maintenance of the machines should be carried out. Vehicles like the rickshaw should be banned, or at least be compelled to maintain their silencers, and all vehicles must be put to a road worthiness test periodically. This already occurs in some EMRO countries, but not all. Horns, hooters, music players and other noise making factors must also be controlled. The use of amplifiers and public address systems should also be banned, and social, leisure and religious activities should be restricted to specific places and times.

Along the sound path, barriers can be used to control noise. There are three kinds of barriers available, namely, space absorbers made out of porous material, resonant absorbers and panel absorbers. Architects, for example, use hollow blocks of porous material. The air gaps between building walls not only keep the buildings cool in hot weather, but also reduce the effects of noise. Ceilings and roofs are often treated with absorbent material. In large factories, architects use corrugated sheets and prefabricated material, which are helpful in reducing noise levels. In Pakistan, some people use clay pots in closely ranked positions on rooftops to reduce the effect of heat as well as noise. For civic works and buildings, special enclosures, barriers and vibration controlling devices should be used. Public halls, such as cinemas, mosques and meeting places should have their walls and floors carpeted, and covered with hangings, mats etc. An effective material is jute, which is grown in many countries, mainly Bangladesh, and it is quite economical. Some of the old highways and most of the busy expressways need natural noise barriers, such as earth banks, trees and plants.

References.

SOUTH-EAST ASIAN REGION. (Sudhakar B. Ogale)

Introduction

The ability to hear sound is a sensory function vital for human survival and communication. However, not all sounds are wanted. Unwanted sounds, for which the term "noise" is normally used, often originate from human activities such as road traffic, rail traffic, aircraft, discos, electric power generators, festivals, firecrackers and toys. In general, however, data on noise pollution in South east Asian countries are not available. For example, there are no comprehensive statistical data regarding the incidence and etiology of hearing impairment. Consequently, it is difficult to estimate the exact percentage of the population affected by community noise.

Excessive noise is the major contributor to many stress conditions. It reduces resistance to illness by decreasing the efficiency of the immune system, and is the direct cause of some gastrointestinal problems. Noise also increases the use of drugs, disturbs sleep and increases proneness to accidents. An increased incidence of mental illness and hospital admissions, increases in absenteeism from work and lethargy from sleep disturbance all result from noise pollution and cause considerable loss of industrial production.

Noise Exposure in India

India is rapidly becoming industrialized and more mechanized, which directly affects noise levels. However, no general population study regarding the magnitude of the noise problem in India has been performed.

Road Traffic Noise

Exposure. A study by the Indian Institute of Road Traffic (IRT) reported that Delhi was the noisiest city in India, followed by Calcutta and Bombay (IRT 1996; Santra & Chakrabarty 1996). The survey examined whether road-traffic noise affected people with respect to annoyance, sleep disturbance, interference with communication and hearing impairment. It showed that 35% of the population in four major cities have bilateral sensory neural hearing loss at noise emission levels above 82 dBA. This is of particular concern in light of a second study, showing that LAeq,24h levels at 24 kerbside locations in Calcutta were 80–92 dBA (Chakrabarty et al. 1997) The mean noise emission levels of four different vehicle categories are presented in Table A2.1.
Table A2.1: Mean noise emission levels of vehicles

<table>
<thead>
<tr>
<th>Type of vehicle</th>
<th>Mean sound pressure level</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 wheelers (motor cycle)</td>
<td>82 dBA</td>
</tr>
<tr>
<td>3 wheelers (auto rickshaw)</td>
<td>87 dBA</td>
</tr>
<tr>
<td>Motor car (taxi, private cars)</td>
<td>85 dBA</td>
</tr>
<tr>
<td>Heavy vehicles (trucks)</td>
<td>92 dBA</td>
</tr>
</tbody>
</table>

*Control Measures.* Only recently has noise pollution been considered an offence in India, under the Environmental (Protection) Act 1986. Several measures are being taken to reduce traffic-noise exposure. These include:

a. Planting trees, shrubs and hedges along roadsides.

b. Mandatory, periodic vehicle inspections by road traffic control.

c. Reintroduction of silent zones, such as around schools, nursing homes and hospitals that face main roads.

d. Regulation of traffic discipline, and a ban on the use of pressure horns.

e. Enforcement of exhaust noise standards.

f. Mandating that silencers be effective in three-wheeled vehicles.

g. The use and construction of bypass roads for heavy vehicles.

h. Limiting night-time access of heavy vehicles to roads in residential neighbourhoods

i. Installation of sound-proof windows.

j. Proper planning of new towns and buildings.

*Air Traffic Noise*

Many airports were originally built at some distance from the towns they served. But due to growing populations and the lack of space, buildings are now commonly constructed alongside airports in India.

*Exposure.* A survey revealed that aircraft produced a high level of noise during take-off, with sound pressure levels of 97–109 dBA for the Airbus, and 109 dBA for Boeing aircraft (SB Ogale, unpublished observations). During landing, the aircraft produced a sound pressure level of 108 dBA. Although exposure to aircraft noise is considered to be less of a problem than exposure to traffic noise, the effects of air-traffic noise are similar to those of road traffic, and include palpitations and frequent awakenings at night.
**Control measures.** The use of ear muffs must be made obligatory at the airport. This can reduce noise exposure to a safe level. An air-traffic control act should also enforce the use and introduction of low-noise aircraft, and mandate fewer night-time flights.

**Rail Traffic Noise**

Very little attention has been paid to the problems of railway noise.

**Exposure.** In Bombay, where the majority of residential buildings are situated on either side of railway tracks, residents are more prone to suffer from acoustic trauma. More than 14% of the population in Bombay suffer from sleep disturbances during night, due to high-speed trains and their whistling. A study on surface railways (SB Ogale, unpublished observations) revealed that platform noise was 71–73 dBA in the morning and 78–83 dBA in the evening. The noise from loudspeakers mounted in the platform was 87–90 dBA. At a distance of 1 m from the engine, the whistle noise was 105–108 dBA for a train with an electric engine, up to 110 dBA for a train with diesel engine and 118 dBA for steam engine trains. Vacuum brakes produced noise levels as high as 95 dBA. This suggests that unprotected railway staff on platforms are at risk of permanent noise induced hearing loss.

**Festival noise**

Festival noise in India was first surveyed in Bombay in late 1970, during the Ganpati festival period. A similar study (Santra et al. 1996) was conducted soon after in Calcutta at the Durga Pooja festival during evening hours (18:00–22:00). The music from loudspeakers produces sound pressure levels of more than 112 dBA. During the festival period the residents experienced a noisy environment for 8–10 h at a stretch, with noise level of 85–95 dBA. This level is above the 80 dBA limit set by WHO for industrial workers exposed to noise for a maximum period of 8 hours.

**Control measures.** In a religious country, it is politically difficult to restrict religious music, even in the interests of public health. A ban on all music from loudspeakers after 22:00 would decrease the sound pressure levels to below the permissible legal limit. A preventive programme is advocated to measure noise levels with sound level metres.

**Fire crackers and toy weapons noise**

**Exposure.** A study conducted by Gupta & Vishvakarma (1989) at the time of Deepawali, an Indian festival of fireworks, determined the auditory status of 600 volunteers from various age groups, before and after exposure to firecrackers. The study also measured the acoustical output of representative samples of toy weapons and firecrackers, and the noise intensity level at critical spectator points. The average sound level at a distance of 3 m from the noise source was 150 dBA, exceeding the 130 dBA level at which adults are at risk for hearing damage. On average, 2.5% of the people surveyed during Deepawali had persistent sensory neural hearing loss of 30 dBA, with those in the 9–15 year old age group being most affected.
**Control Measures.** A judicious approach in the manufacture and use of toy weapons and firecrackers is encouraged, in addition to legal restraints. Fireworks should be more a display of light, rather than sound.

**Generator Noise**

Diesel generators are often used in India to produce electric power. Big generators produce sound pressure levels exceeding 96 dBA (SB Ogale, unpublished observations).

**Conclusions**

No comprehensive statistical data are available for community noise in India, however, the main sources of environmental noise are road traffic, air traffic, rail traffic, festivals, firecrackers and diesel generators. The adverse effects of noise are difficult to quantify, since tolerance to noise levels and to different types of noise varies considerably between people. Noise intensity also varies significantly from place to place. It should also be noted that noise data from different countries are often not obtained by the same method, and in general models have been used which are based on data from a limited number of locations. Noise control measures could be taken at several levels, including building design, legal measures, and educating the people on the health dangers of community noise. In India, what is needed now is noise control legislation and its strict enforcement, if a friendly, low-noise environment is to be maintained.

**Noise Exposure in Indonesia**

According to a report by the WHO, the noise exposure and control situation in Indonesia is as follows (Dickinson 1993).

**Exposure.** No nationwide data are available for Indonesia. However, during the last three decades there has been rapid growth in transportation, industry and tourism in Indonesia.

**Control Measures.** With the large majority of people having little income, protection of the physical environment has not been a first-order priority. The following recommendations have been made with respect to community noise (Dickinson 1993):

a. The cities of Indonesia have relatively large populations and each provincial government will need the staff and equipment to monitor and manage the environment.

b. Sound level meters with noise analysis computer programmes should be purchased.

c. Training courses and adequate equipment should be provided.
d. Noise management planning for airports should be promoted.

e. Reduction measures should be taken for road-traffic noise.

Noise Exposure in Bangladesh

*Exposure.* In Bangladesh no authentic statistical data on the effects of community noise on deafness or hearing impairment are available (Amin 1995).

*Control Measures.* Governments have meager resources, a vast population to contend with and high illiteracy rates; consequently, priorities are with fighting hunger, malnutrition, diseases and various man-made and natural calamities. The governments are unable to give the necessary attention towards the prevention, early detection and management of noise disabilities in the country. Close cooperation is needed between the national and international organizations, to exchange ideas, skills and knowledge (Amin 1995).

Noise Exposure in Thailand

*Exposure.* Noise from traffic, construction, and from factories and industry has become a big problem in the Bangkok area. The National Environmental Board of Thailand was set up two decades ago and has been active in studying the pollution problems in Thailand. Indeed, a committee on noise pollution control was set up to study the noise pollution in Bangkok area and its surroundings. Although regulations and recommendations were made for controlling various sources of noise, the problem was not solved due to a lack of public awareness, the difficulty of proving that noise had adverse effects on health and hearing, and the difficulty of getting access to control noise. A general survey revealed that 21.4% of the Bangkok population is suffering from sensory neural hearing loss (Prasanchuk 1997). Noise sources included street noise, traffic noise, industrial noise and leisure noise.

*Control Measures.* In 1996, regulations for noise pollution control set LAeq,24h levels at 70 dBA for residential areas, and less than 50 dBA to avoid annoyance. The National Committee on Noise Pollution Control has been asked to study the health effects of noise in the Bangkok area and its surroundings, and determine whether these regulations are realistic and feasible.

References.

WESTERN PACIFIC REGION.

In this section, information on noise pollution and control will be given for three countries in the Western Pacific Region, namely Australia, the People’s Republic of China and Japan. From a noise pollution point of view China may be viewed as a developing country, whereas Japan and Australia, with their high level of industrialization, represent developed countries.

Australia (Andrew Hede & Michinori Kabuto)

Exposure. Australia has a population of 18 million with the majority living in cities that have experienced increasing noise pollution from a number of sources. The single most serious source of noise is road traffic, although in major cities such as Sydney, Melbourne and Perth, large communities are exposed to aircraft noise as well. Other important sources of noise pollution are railway noise and neighbourhood noise (including barking dogs, lawn mowers and garbage collection). A particular problem in Australia is that the climate encourages most residents to live with open windows, and few houses have effective noise insulation.

A study of road-traffic noise was conducted at 264 sites in 11 urban centres with populations in excess of 100 000 people (Brown et al. 1994). Noise was measured one metre from the façade of the most exposed windows and at window height. From the results, it was estimated that over 9% of the Australian population is exposed to LA10,18h levels of 68 dB or greater, and 19% of the population is exposed to noise levels of 63 dB or greater. In terms of LAeq values for daytimes, noise exposure in Australia is worse than in the Netherlands, but better than in Germany, France, Switzerland or Japan.

Control. In the mid-1990’s, when a third runway was built at Sydney Airport, the government funded noise insulation of high-exposed dwellings. Increasingly, too, major cities are using noise barriers along freeways adjacent to residential communities. In most states barriers are mandatory for new freeways and for new residential developments along existing freeways and major motorways. There has been considerable testing of noise barriers by state agencies, to develop designs and materials that are cost effective.


China (Chen Ming)

Introduction

Urban noise pollution has become a contemporary world problem. Urban noise influences people’s living, learning and working. People exposed to noise feel disagreeable and cannot concentrate on work. Rest and sleep are also disturbed. People exposed to high-intensity noise
do not hear alarm signals and cannot communicate with each other. This can result in injury and, indeed, with the modernization of China, construction accidents related to noise are increasing. According to statistics for several cities in China, including Beijing, Shanghai, Tientsin and Fuzhou, the proportion of total accidents that were noise related was 29.7% in 1979, 34.6% in 1980, 44.8% in 1981 and 50% in 1990. It is therefore very important to control noise pollution in China.

Long-term exposure to urban environmental noise can lead to temporary hearing loss (assessed by temporary threshold shift), permanent hearing loss (assessed by permanent threshold shift) or deafness. Microscopy studies have shown that in people exposed to noise for long periods, hair cells, nerve fibers and ganglion cells were absent in the cochleae, especially in the basal turns. The primary lesion is in the 8–10 mm region of the cochlea, which is responsible for detecting sound at a frequency of 4 000 Hz. People chronically exposed to noise may first complain about tinnitus and, later on, about hearing loss. This is especially true for patients who have bilateral hearing loss at 4 000 Hz, but who have relatively good hearing other frequencies. Non-auditory symptoms of noise include effects on the nervous system, cardiovascular system and blood system. These symptoms were rarely observed in China in the past, but today more and more people complain about hearing damage and non-auditory physiological effects.

Urban environmental noise has thus become a common concern of all members of society. A key to resolving the complex noise issue lies in the effective control of urban noise sources. Control measures include reducing noise at its source, changing noise transmission pathways, building design, community planning and the use of personal hearing protection.

Urban environmental noise sources can be divided into industrial noise, traffic noise, building architecture noise and community district noise sources. Only the last three types are of concern here.

**Traffic Noise**

There are four sources of traffic noise: road traffic, railway transport, civil aviation and water transport; of these, road traffic is the main source of urban noise. The sound emission levels of heavy-duty trucks are 82–92 dBA and 90–100 dBA for electric horns; air horns are even worse, with sound emission levels of 105–110 dBA. Most urban noise from automobiles is in the 70–75 dB range, and it has been estimated that 27% of all complaints are about traffic noise. When a commercial jet takes off, speech communication is interrupted for up to 1 km on both sides of the runway, but people as far away as 4 km are disturbed in their sleep and rest. If a supersonic passenger plane flies at an altitude of 1 500 m, its sound pressure waves can be heard on the ground in a 30–50 km radius.

**Building Noise**

As a result of urban development in China, construction noise has become an increasingly serious problem. It is estimated that 80% of the houses in Fuzhou were built in the past 20 years. According to statistics, the noise from ramming in posts and supports is about 88 dB and the noise from bulldozers and excavators is about 91 dB, 10 m from the equipment. About 98% of
industrial noise is in the 80–105 dB range, and it is estimated that 20% of all noise complaints is about industrial noise.

**Community Noise**

The main sources of community noise include street noise, noise from electronic equipment (air conditioners, refrigerators, washing machines, televisions), music, clocks, gongs and drums. Trumpets, gongs, drums and firecrackers, in particular, seriously disturb normal life and lead to annoyance complaints.

In conclusion, urban noise pollution in China is serious and is getting worse. To control noise pollution, China has promulgated standard sound values for environmental noise. These are summarized in table A2.2.

Table A2.2: LAeq standard values in dB for environmental noise in urban areas.

<table>
<thead>
<tr>
<th>Applied area</th>
<th>day</th>
<th>night</th>
</tr>
</thead>
<tbody>
<tr>
<td>Special residential quarters¹</td>
<td>45</td>
<td>35</td>
</tr>
<tr>
<td>Residential and cultural education area²</td>
<td>50</td>
<td>40</td>
</tr>
<tr>
<td>Type 1 mixed area³</td>
<td>55</td>
<td>45</td>
</tr>
<tr>
<td>Type 2 mixed area⁴ or commercial area</td>
<td>60</td>
<td>50</td>
</tr>
<tr>
<td>Industrial area</td>
<td>65</td>
<td>55</td>
</tr>
<tr>
<td>Arterial roads⁵</td>
<td>70</td>
<td>55</td>
</tr>
</tbody>
</table>

1. Special residential quarters: quiet residential area
2. Residential and cultural education area: residential quarters, cultural, educational offices
3. Type 1 mixed area: mixture of commercial area and residential quarters
4. Type 2 mixed area: mixture of industrial area, commercial area, residential quarters and others
5. Roads with traffic volume of more than 100 cars per hour

The peak sound levels for frequent noises emitted during the night-time are not allowed to exceed standard values by more than 10 dBA. Single, sudden noises during the night-time are not allowed to exceed standard values by more than 15dBA.

**References**

National environmental protection leader group. GB 3096-82. Urban environmental noise
Beijing Medical Quarantine Station: The investigation analysis of the noise hazard condition in nine provinces and cities. The noise work investigation cooperation group in nine provinces and cities (internal material). 1982.

Japan (Michinori Kabuto)

Environmental Quality Standards

Noise standards for both general and roadside areas were set in Japan in 1967, through the “Basic Law for Environmental Pollution.” This law was updated in September 1999. Each standard is classified according to the type of land use and the time of day. In ordinary residential areas, the night-time standard is 45 dB LAeq, but in areas that require even lower noise exposure, such as hospitals, this is lowered to 40 dB LAeq. In contrast, the daytime levels for commercial and industrial areas is as high as 60 dBA. Standards for roadside areas are 70 dB LAeq for daytime and 65 dB LAeq for nighttime. Between 1973–1997 noise standards for aircraft noise, super-express train noise and conventional railway train noise were also implemented. Standards for aircraft noise were set in terms of the weighted equivalent continuous perceived noise level (WECPNL). For residential areas, the WECPNL standard is 70 dBA, and is 75 dBA for areas where it is necessary to maintain a normal daily life.

For super-express trains, the Environmental Agency required noise levels to be below 75 dBA in densely populated residential areas, such as along the Tokaido and Sanyo Shinkansen lines, as well as in increasingly populated areas, such as along the Tohoku and Joetsu Shinkansen lines. The standards were to be met by 1990, but by 1991 this level had been achieved at only 76% of the measuring sites on average. Noise countermeasures included the installation of new types of sound-proof walls, and laying ballast mats along densely populated stretches of the four Shinkansen lines. Noise and vibration problems can also result from conventional trains, such as occurred with the opening of the Tsugaru Strait and Seto Ohashi railway lines in 1988. Various measures have since been taken to address the problems.

Complaints About Community Noise.

In Japan, complaints to local governments about environmental problems have been summarized annually and reported by Japan Environmental Agency. Thirty-seven percent of all complaints was due to factory (machinery) noise; 22% to construction noise; 3% to road traffic noise; 4% to air traffic noise; 0.8% to rail traffic noise; 9% to night-time business; 6% to other commercial activities; 2.5% to loudspeaker announcements; 9% to domestic noise; and 8% was due to miscellaneous complaints.
Sources of Noise Exposure and their Effects

Road-traffic noise. The number of automobiles in Japan has increased from 20 million in 1971 to 70 million in 1994, a 3.5-fold increase. One-third of this increase was due to heavy-duty vehicles. Since 1994, out of a total of 1 150 000 km of roads in Japan, only 29 930 km have been designed according to noise regulations. According to 1998 estimates by the Environmental Agency, 58% of all roads passed through residential areas. Daytime noise limits were exceeded in 92% of all cases, and night-time limits were exceeded in 87% of all cases. The study also estimated that 0.5 million houses within 10 m of the roads were exposed to excessive traffic noise. In a recent lawsuit, the Japanese Supreme Court ruled that people should be compensated when exposed to night-time noise levels exceeding 65 dB Laeq. This would apply to people living alongside 2 000 km of roads in Japan.

A recent epidemiological study examined insomnia in 3 600 women living in eight different roadside areas exposed to night-time traffic. Insomnia was defined as one or more of the following symptoms: difficulty in falling asleep; waking up during sleep; waking up too early; and feelings of sleeplessness one or more days a week over a period of at least a month. The data were adjusted for confounding variables, such as age, medical care, whether the subjects had young children to care for, and sleep apnea symptoms. The results showed that the odds ratio for insomnia was significantly correlated with the average night-time traffic volume for each of the eight areas and suggested that insomnia could be attributed solely to night-time road traffic.

From the most noisy areas in the above study 19 insomnia cases were selected for a further in-depth examination. The insomnia cases were matched in age and work with 19 control subjects. Indoor and outdoor sound levels during sleep were measured simultaneously at 0.6 s intervals. For residences facing roads with average night-time traffic volume of 6 000 vehicles per hour, the highest sound levels observed were 78–93 dBA. The odds ratios for insomnia in each of the quartiles for LAmmax,1min; L50,1min; L10,1min and LAeq,1min generally showed a linear trend and ranged between 1 (lowest quartile) and 6–7 (highest quartile). It was concluded that insomnia was likely to result when night-time indoor LAeq, 1min sound levels exceeded 30 dBA.

Air-traffic noise At the larger Japanese airports (Osaka, Tokyo, Fukuoka), jet airplanes have rapidly increased in number and have caused serious complaints and lawsuits from those living nearby. Complaints about jet-fighter noise are also common from residents living in the vicinity of several U.S. airbases located in Japan. In the case of Kadena and Futemma airbases on Okinawa, a recent study by the Okinawa Prefecture Government suggested that hearing loss, child misbehaviour and low birth-weight babies were possible health effects of the noise associated with these bases (RSCANIH 1997). Using measurements taken in 1968 during the Vietnam War, it was estimated that the WECPNL was 99–108 dBA at the Kadena village fire station. Similar WECPNL estimates of 105 dBA were also obtained for Yara (Kadena-cho) and Sunabe (Chatan-cho) bases. These levels correspond to a LAeq,24h value of 83 dB, and are of serious concern in light of recommendations by the Japan Association of Industrial Health that occupational noise exposure levels should not exceed 85 dB for an 8-h work day if hearing loss is to be avoided.
Audiograms of subjects living in areas surrounding Kadena airport indicated that they had progressive hearing loss at higher frequencies. Eight subjects had hearing impairment in the 3–6 kHz range, which strongly suggested that the hearing loss was due to excessive noise exposure. Since the examiners confirmed that the subjects had not been exposed to repeated intense noise at their residences or workplaces, the most likely cause of their hearing loss was the intense aircraft noise during take-offs, landings and tune-ups at Kadena airport.

The effects of noise were examined in children from nursery schools and kindergartens in towns surrounding Kadena airport. The children were scored with respect to seven variables: cold symptoms, emotional instability, discontentment-anxiety, headache-stomachache, passivity, eating problems and urination problems. Confounding factors, such as sex, age, birth order, the number of parents living together, the mother’s age when the child was born, reaction to noise and the extent of noise exposure, were taken into account. The results showed that children exposed to noise had significantly more problems with respect to their behaviour, physical condition, character and reaction to noise, when compared to a control group of children that had not been exposed to airport noise. This was especially true of for children exposed to a WECINL of 75 or more. Thus, small children acquire both physical and mental disorders from chronic exposure to aircraft noise.

Chronic exposure to aircraft noise also affects the birth-weight of children. The birth-weights of infants were analyzed using records from 1974 to 1993 in the Okinawa Prefecture. Confounding factors such as the mother’s age, whether there were single or multiple embryos, the child’s sex, and the legitimacy of the child were considered. The results showed that 9.1% of all infants born in Kadena-cho, located closest to Kadena airport, had low birth-weights. This was significantly higher than the 7.6% rate seen in other municipalities around Kadena and Futemma airfields, and much higher than the 7% rate in cities, towns and villages on other parts of Okinawa Island.

**Rail-traffic noise.** Commuter trains and subway cars expose Tokyo office workers to much higher noise levels than do other daily activities (Kabuto & Suzuki 1976). Exposure to indoor noise may vary according to railway line or season (there are more open windows in good weather), but the levels range from 65–85 dBA. In general, these values exceeded the LAeq,24h level of 70 dBA for auditory protection (US EPA 1974).

**Neighbourhood noise.** Neighbourhood noise, including noise from late-night business operations, noise caused by loudspeaker announcements, and noise from everyday activities, have accounted for approximately 39% of all complaints about noise in recent years. At present, noise controls for late-night business operations have been enforced by ordinances in 39 cities and prefectures, and in 42 cities for loudspeaker announcements.

**References**


### Appendix 3: Glossary

<table>
<thead>
<tr>
<th>Term</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acoustic</td>
<td>Pertaining to sound or to the sense of hearing (CMD 1997)</td>
</tr>
<tr>
<td>Acoustic dispersion</td>
<td>Change of speed of sound with frequency (ANSI 1994)</td>
</tr>
<tr>
<td>Acoustic trauma</td>
<td>Injury to hearing by noise, especially loud noise (CMD 1997)</td>
</tr>
<tr>
<td>Adverse effect</td>
<td>(of noise:) A change in morphology and physiology of an organism which results in impairment of functional capacity or impairment of capacity to compensate for additional stress or increase in susceptibility to the harmful effects of other environmental influences. This definition includes any temporary or long term lowering of physical, psychological or social functioning of humans or human organs (WHO 1994)</td>
</tr>
<tr>
<td>Annoyance</td>
<td>A feeling of displeasure associated with any agent or condition known or believed by an individual or a group to be adversely affecting them” (Lindvall and Radford 1973; Koelega 1987). Any sound that is perceived as irritating or a nuisance (ANSI 1995)</td>
</tr>
<tr>
<td>Anxiety</td>
<td>A feeling of apprehension, uncertainty, and fear without apparent stimulus, and associated with physiological changes (tachycardia, sweating, tremor, etc.) (DIMD 1985). A vaguer feeling of apprehension, worry, uneasiness, or dread, the source of which is often nonspecific or unknown to the individual (CMD 1997).</td>
</tr>
<tr>
<td>Audiology</td>
<td>Testing of the hearing sense (CMD 1997). Measurement of hearing, including aspects other than hearing sensitivity (ANSI 1995)</td>
</tr>
<tr>
<td>Auditory</td>
<td>Pertaining to the sense of hearing (CMD 1997)</td>
</tr>
<tr>
<td>Auditory threshold</td>
<td>Minimum audible sound perceived (CMD 1997)</td>
</tr>
<tr>
<td>A-weighting</td>
<td>A frequency dependent correction that is applied to a measured or calculated sound of moderate intensity to mimic the varying sensitivity of the ear to sound for different frequencies</td>
</tr>
<tr>
<td><strong>Ambient noise</strong></td>
<td>All-encompassing sound at a given place, usually a composite of sounds from many sources near and far (ANSI 1994)</td>
</tr>
<tr>
<td>-------------------</td>
<td>---------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td><strong>Articulation index</strong></td>
<td>Numerical value indicating the proportion of an average speech signal that is understandable to an individual (ANSI 1995)</td>
</tr>
<tr>
<td><strong>Bel</strong></td>
<td>Unit of level when the base of the logarithm is ten, and the quantities concerned are proportional to power; unit symbol B (ANSI 1994)</td>
</tr>
<tr>
<td><strong>Cardiovascular</strong></td>
<td>Pertaining to the heart and blood vessels (DIMD 1985)</td>
</tr>
<tr>
<td><strong>Cochlea</strong></td>
<td>A winding cone-shaped tube forming a portion of the inner ear. It contains the receptor for hearing (CMD 1997)</td>
</tr>
<tr>
<td><strong>Cognitive</strong></td>
<td>Being aware with perception, reasoning, judgement, intuition, and memory (CMD 1997)</td>
</tr>
<tr>
<td><strong>Community noise</strong></td>
<td>Noise emitted from all noise sources except noise at the industrial workplace (WHO 1995a)</td>
</tr>
<tr>
<td><strong>Cortisol</strong></td>
<td>A glucocortical hormone of the outer layer of the adrenal gland (CMD 1997)</td>
</tr>
<tr>
<td><strong>Critical health effect</strong></td>
<td>Health effect with lowest effect level</td>
</tr>
<tr>
<td><strong>C-weighting</strong></td>
<td>A frequency dependent correction that is applied to a measured or calculated sound of high intensity to mimic the varying sensitivity of the ear to sound for different frequencies</td>
</tr>
<tr>
<td><strong>dB</strong></td>
<td>Decibel, one-tenth of a bel</td>
</tr>
<tr>
<td><strong>dBA</strong></td>
<td>A-weighted frequency spectrum in dB, see A-weighting</td>
</tr>
<tr>
<td><strong>dBC</strong></td>
<td>C-weighted frequency spectrum in dB, see C-weighting</td>
</tr>
<tr>
<td><strong>dBlin</strong></td>
<td>Unweighted frequency spectrum in dB</td>
</tr>
<tr>
<td><strong>Decibel</strong></td>
<td>Unit of level when the base of the logarithm is the tenth root of ten, and the quantities concerned are proportional to power; unit symbol dB (ANSI 1994)</td>
</tr>
<tr>
<td>Term</td>
<td>Definition</td>
</tr>
<tr>
<td>-------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Ear plug</td>
<td>Hearing protector that is inserted into the ear canal (ANSI 1994)</td>
</tr>
<tr>
<td>Ear muff</td>
<td>Hearing protector worn over the pinna (external part) of an ear (ANSI 1994)</td>
</tr>
<tr>
<td>Effective perceived noise level</td>
<td>Level of the time integral of the antilogarithm of one tenth of tone-corrected perceived noise level over the duration of an aircraft fly-over, the reference duration being 10 s (ANSI 1994)</td>
</tr>
<tr>
<td>Emission</td>
<td>(of sounds). Sounds generated from all types of sources</td>
</tr>
<tr>
<td>Epinephrine</td>
<td>A hormone secreted by the adrenal medulla (inner or central portion of an organ) in response to stimulation of the sympathetic nervous system (CMD 1997)</td>
</tr>
<tr>
<td>Equal energy principle</td>
<td>Hypothesis that states that the total effect of sound is proportional to the total amount of sound energy received by the ear, irrespective of the distribution of that energy in time</td>
</tr>
<tr>
<td>Equivalent sound pressure level</td>
<td>Ten times the logarithm to the base ten of the ratio of the time-mean-square instantaneous sound pressure, during a stated time interval T, to the square of the standard reference sound pressure (ANSI 1994)</td>
</tr>
<tr>
<td>Exposure-response curve</td>
<td>Graphical representation of exposure-response relationship</td>
</tr>
<tr>
<td>Exposure-response relationship</td>
<td>(With respect to noise:) Relationship between specified sound levels and health impacts</td>
</tr>
<tr>
<td>Frequency</td>
<td>For a function periodic in time, the reciprocal of the period (ANSI 1994)</td>
</tr>
<tr>
<td>Frequency-weighting</td>
<td>A frequency dependent correction that is applied to a measured or calculated sound (ANSI 1994)</td>
</tr>
<tr>
<td>Gastro-intestinal</td>
<td>Pertaining to the stomach and intestines (CMD 1997)</td>
</tr>
<tr>
<td>Hearing impairment, hearing loss</td>
<td>A decreased ability to perceive sounds as compared which what the individual or examiner would regard as normal (CMD 1997)</td>
</tr>
<tr>
<td>Hearing threshold</td>
<td>For a given listener and specified signal, the minimum (a) sound pressure level or (b) force level that is capable of</td>
</tr>
<tr>
<td>Term</td>
<td>Definition</td>
</tr>
<tr>
<td>-------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Hertz</td>
<td>Unit of frequency, the number of times a phenomenon repeats itself in a unit of time; abbreviated to Hz</td>
</tr>
<tr>
<td>Hysteria</td>
<td>A mental disorder, usually temporary, presenting somatic (pertaining to the body) symptoms, stimulating almost any type of physical disease. Symptoms include emotional instability, various sensory disturbances, and a marked craving for sympathy (CMD 1997)</td>
</tr>
<tr>
<td>Immission</td>
<td>Sounds impacting on the human ear.</td>
</tr>
<tr>
<td>Impulsive sound</td>
<td>Sound consisting of one or more very brief and rapid increases in sound pressure</td>
</tr>
<tr>
<td>Incubator</td>
<td>An enclosed crib, in which the temperature and humidity may be regulated, for care of premature babies (CMD 1997)</td>
</tr>
</tbody>
</table>
| Isolation, insulation         | (With respect to sound:) Between two rooms in a specified frequency band, difference between the space-time average sound pressure levels in the two enclosed spaces when one or more sound sources operates in one of the rooms (ANSI 1994).  
(With respect to vibrations:) Reduction in the capacity of a system to respond to excitation, attained by use of resilient support (ANSI 1994). |
<p>| Ischaemic Heart Disease       | Heart disease due to a local and temporary deficiency of blood supply due to obstruction of the circulation to a part (CMD 1997)                                                                         |
| Loudness level               | Of a sound, the median sound pressure level in a specified number of trials of a free progressive wave having a frequency of 1000 Hz that is judged equally loud as the unknown sound when presented to listeners with normal hearing who are facing the source; unit phon (ANSI 1994) |
| Level                        | Logarithm of the ratio of a quantity to a reference quantity of the same kind; unit Bel (ANSI 1994)                                                                                                      |
| Maximum sound level          | Greatest fast (125 milliseconds) A-weighted sound level, within a stated time interval (ANSI 1994)                                                                                                       |</p>
<table>
<thead>
<tr>
<th>Term</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mental Health</td>
<td>The absence of identifiable psychiatric disorder according to current norms (Freeman 1984). In noise research, mental health covers a variety of symptoms, ranging from anxiety, emotional stress, nervous complaints, nausea, headaches, instability, argumentativeness, sexual impotency, changes in general mood and anxiety, and social conflicts, to more general psychiatric categories like neurosis, phychosis and hysteria (Berglund and Lindvall 1995).</td>
</tr>
<tr>
<td>Morphological</td>
<td>Pertaining to the science of structure and form of organisms without regard to function (CMD 1997)</td>
</tr>
<tr>
<td>Nausea</td>
<td>An unpleasant sensation usually preceding vomiting (CMD 1997)</td>
</tr>
<tr>
<td>Neurosis</td>
<td>An emotional disorder due to unresolved conflicts, anxiety being its chief characteristic (DIMD 1985)</td>
</tr>
<tr>
<td>Noise</td>
<td>Undesired sound. By extension, noise is any unwarranted disturbance within a useful frequency band, such as undesired electric waves in a transmission channel or device (ANSI 1994).</td>
</tr>
<tr>
<td>Noise induced temporary threshold shift</td>
<td>Temporary hearing impairment occurring as a result of noise exposure, often phrased temporary threshold shift (adapted from ANSI 1994)</td>
</tr>
<tr>
<td>Noise induced permanent threshold shift</td>
<td>Permanent hearing impairment occurring as a result of noise exposure, often phrased permanent threshold shift (adapted from ANSI 1994)</td>
</tr>
<tr>
<td>Noise level</td>
<td>Level of undesired sound</td>
</tr>
<tr>
<td>Norepinephrine</td>
<td>A hormone produced by the adrenal medulla (inner or central portion of an organ), similar in chemical and pharmacological properties to epinephrine, but chiefly a vasoconstrictor with little effect on cardiac output (CMD 1997)</td>
</tr>
<tr>
<td>Oscillation</td>
<td>Variation, usually with time, of the magnitude of a quantity with respect to a specified reference when the magnitude is alternately greater and smaller than the reference (ANSI 1994)</td>
</tr>
<tr>
<td>Term</td>
<td>Definition</td>
</tr>
<tr>
<td>-----------------------------</td>
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</tr>
<tr>
<td>Ototoxic</td>
<td>Having a detrimental effect on the organs of hearing (CMD 1997)</td>
</tr>
<tr>
<td>Paracusis</td>
<td>Any abnormality or disorder of the sense of hearing (CMD 1997)</td>
</tr>
<tr>
<td>Pascal</td>
<td>Unit of pressure, equal to one newton per square meter, abbreviated to Pa</td>
</tr>
<tr>
<td>Peak sound pressure</td>
<td>Greatest absolute instantaneous sound pressure within a specified time interval (ANSI 1994)</td>
</tr>
<tr>
<td>Peak sound pressure level</td>
<td>Level of peak sound pressure with stated frequency weighting, within a specified time interval (ANSI 1994)</td>
</tr>
<tr>
<td>Perceived noise level</td>
<td>Frequency-weighted sound pressure level obtained by a stated procedure that combines the sound pressure levels in the 24 one-third octave bands with midband frequencies from 50 Hz to 10 kHz (ANSI 1994)</td>
</tr>
<tr>
<td>Permanent threshold shift,</td>
<td>Permanent increase in the auditory threshold for an ear (adapted from ANSI 1995) (see also: noise induced permanent threshold shift)</td>
</tr>
<tr>
<td>permanent hearing loss</td>
<td></td>
</tr>
<tr>
<td>Presbyacusia, presbycusis</td>
<td>The progressive loss of hearing ability due to the normal aging process (CMD 1997)</td>
</tr>
<tr>
<td>Psychiatric disorders</td>
<td>Mental disorders</td>
</tr>
<tr>
<td>Psychosis</td>
<td>Mental disturbance of a magnitude that there is a personality disintegration and loss of contact with reality (CMD 1997)</td>
</tr>
<tr>
<td>Psychotropic drug</td>
<td>A drug that affects psychic function, behaviour or experience (CMD 1997)</td>
</tr>
<tr>
<td>Reverberation time</td>
<td>Of an enclosure, for a stated frequency or frequency band, time that would be required for the level of time-mean-square sound pressure in the enclosure to decrease by 60 dB, after the source has been stopped (ANSI 1994)</td>
</tr>
<tr>
<td>Sensorineural</td>
<td>Of or pertaining to a sensory nerve; pertaining to or affecting a sensory mechanism and/or a sensory nerve (DIMD 1985)</td>
</tr>
<tr>
<td>Term</td>
<td>Definition</td>
</tr>
<tr>
<td>-----------------------------</td>
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</tr>
<tr>
<td>Signal</td>
<td>Information to be conveyed over a communication system (ANSI 1994)</td>
</tr>
<tr>
<td>Signal-to-noise ratio</td>
<td>Ratio of a measure of a signal to the same measure of the noise (ANSI 1995) (see also: noise—in its extended meaning)</td>
</tr>
<tr>
<td>Silencer</td>
<td>Duct designed to reduce the level of sound; the sound-reducing mechanisms may be either absorptive or reactive, or a combination (ANSI 1994)</td>
</tr>
<tr>
<td>Sound absorption</td>
<td>Change in sound energy into some other form, usually heat, in passing through a medium or on striking a surface (ANSI 1994)</td>
</tr>
<tr>
<td>Sound energy</td>
<td>Total energy in a given part of a medium minus the energy that would exist at that same part with no sound waves present (ANSI 1994)</td>
</tr>
<tr>
<td>Sound exposure</td>
<td>Time integral of squared, instantaneous frequency-weighted sound pressure over a stated time interval or event (ANSI 1994)</td>
</tr>
<tr>
<td>Sound exposure level</td>
<td>Ten times the logarithm to the base ten of the ratio of a given time integral of squared, instantaneous A-weighted sound pressure, over a stated time interval or event, to the product of the squared reference sound pressure of 20 micropascals and reference duration of one second (ANSI 1994)</td>
</tr>
<tr>
<td>Sound intensity</td>
<td>Average rate of sound energy transmitted in a specified direction at a point through a unit area normal to this direction at the point considered (ANSI 1994)</td>
</tr>
<tr>
<td>Sound level meter</td>
<td>Device to be used to measure sound pressure level with a standardized frequency weighting and indicated exponential time weighting for measurements of sound level, or without time weighting for measurement of time-average sound pressure level or sound exposure level (ANSI 1994)</td>
</tr>
<tr>
<td>Sound pressure</td>
<td>Root-mean-square instantaneous sound pressure at a point, during a given time interval (ANSI 1994), where the instantaneous sound pressure is the total instantaneous pressure in that point minus the static pressure (ANSI 1994)</td>
</tr>
<tr>
<td>Term</td>
<td>Description</td>
</tr>
<tr>
<td>-------------------------------------------</td>
<td>---------------------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>Sound pressure level</td>
<td>Ten times the logarithm to the base ten of the ratio of the time-mean-square pressure of a sound, in a stated frequency band, to the square of the reference sound pressure in gases of 20 μPa (ANSI 1994)</td>
</tr>
<tr>
<td>Sound reduction index</td>
<td>Single-number rating of airborne sound insulation of a partition (ANSI 1994)</td>
</tr>
<tr>
<td>Sound transmission class</td>
<td>Single-number rating of airborne sound insulation of a building partition (ANSI 1994)</td>
</tr>
<tr>
<td>Speech interference level</td>
<td>One-fourth of the sum of the band sound pressure levels for octave-bands with nominal midband frequencies of 500, 100, 2000 and 4000 Hz (ANSI 1994)</td>
</tr>
<tr>
<td>Speech intelligibility</td>
<td>That property which allows units of speech to be identified (ANSI 1995)</td>
</tr>
<tr>
<td>Speech perception</td>
<td>Psychological process that relates a sensation caused by a spoken message to a listener’s knowledge of speech and language (ANSI 1995)</td>
</tr>
<tr>
<td>Speech comprehension</td>
<td>(a) Highest level of speech perception. (b) Knowledge or understanding of a verbal statement (ANSI 1995)</td>
</tr>
<tr>
<td>Speech transmission index</td>
<td>Physical method for measuring the quality of speech-transmission channels accounting for nonlinear distortions as well as distortions of time (ANSI 1995)</td>
</tr>
<tr>
<td>Stereocilia</td>
<td>Nonmotile protoplasmic projections from free surfaces on the hair cells of the receptors of the inner ear (CMD 1997)</td>
</tr>
<tr>
<td>Stress</td>
<td>The sum of the biological reactions to any adverse stimulus, physical, mental or emotional, internal or external, that tends to disturb the organism’s homeostasis (DIMD 1985)</td>
</tr>
<tr>
<td>Temporary threshold shift, temporary hearing loss</td>
<td>Temporary increase in the auditory threshold for an ear caused by exposure to high-intensity acoustic stimuli (adapted from ANSI 1995) (see also: noise induced temporary threshold shift).</td>
</tr>
<tr>
<td>Tinnitus</td>
<td>A subjective ringing or tinkling sound in the ear (CMD 1997). Otological condition in which sound is perceived by</td>
</tr>
</tbody>
</table>
a person without an external auditory stimulation. The sound may be a whistling, ringing, buzzing, or cricket type sounds, but auditory hallucinations of voices are excluded (ANSI 1995).

Vibration

Oscillation of a parameter that defines the motion of a mechanical system (ANSI 1994)

For references see Appendix A.
Appendix 4 : Acronyms

AAP  American Academy of Pediatrics
AI   Articulation Index
AMIS Air Management Information System (WHO, Healthy Cities)
ANEF Australian Noise Exposure Forecast
ANSI American National Standard Institute, Washington DC, USA
ASCII American Standard Code for Information Interchange
ASHA American Speech-Language-Hearing Association, Rockville, MD, USA
ASTM American Society for Testing and Materials, West Conshohocken, PA, USA
CEN Comité Européen de Normalisation, Brussels, Belgium (European Committee for Standardization)
CFR Code of Federal Regulations (United States)
CIAL Centro de Investigaciones Acústicas y Luminotécnicas, Córdoba, Argentina
(Centre of acoustical and light-technical investigations)
CMD Cyclopedic Medical Dictionary
CNRC Conseil National de Recherches du Canada (National Research Council)
COPD Chronic Obstructive Pulmonary Disease
CSD Commission for Sustainable Development
CSIRO Commonwealth Scientific and Industrial Research Organization
CVS Cardiovascular System
DNL Day-Night Average Sound Level (United States)
EC DG European Commission Directorate General
ECE Economic Commission for Europe
ECMT European Conference of Ministers of Transport
EHIAP Environmental Health Impact Assessment Plan
EIAP Environmental Impact Assessment Plan
EMRO WHO Regional Office of the Eastern Mediterranean
ENIA Environmental Noise Impact Analysis
EPNL Effective Perceived Noise Level measure
EU European Union
FAA Federal Aviation Administration (United States)
FFT Fast Fourier Transform technique
GIS Geographic Information System
Hz Hertz, the unit of frequency
ICAO International Civil Aviation Organization
ICBEN International Commission on the Biological Effects of Noise
IEC International Electrotechnical Commission
ILO International Labour Office, Geneva, Switzerland
INCE Institute of Noise Control Engineering of the United States of America
INRETS Institut National de REcherche sur les Transports et leur Sécurité, Arcueil, France
(National Research Institute for Transport and their Safety)
ISO International Standards Organization
I-INCE International Institute of Noise Control Engineering
L10 10 percentile of sound pressure level

133
L50 Median sound pressure level
L90 90-percentile of sound pressure level
LA Latin America
LAeq,T A-weighted equivalent sound pressure level for period T
LAmx Maximum A-weighted sound pressure level in a stated interval
Leq,T Day and night continuous equivalent sound pressure level
LEQ(FLG) Descriptor used for aircraft noise (Germany)
LNIP Low Noise Implementation Plan
Lp Sound pressure level
MTF Modulation Transfer Function
NASA National Aeronautics and Space Administration (United States)
NC Noise Criterion
NCA Noise Control Act (United States)
NCB Balanced Noise Criterion procedure system
NEF Noise Exposure Forecast
NEPA National Environmental Policy Act (United States)
NGO Non Governmental Organization
NIHL Noise Induced Hearing Loss
NIPTS Noise Induced Permanent Threshold Shift
NITTTS Noise Induced Temporary Threshold Shift
NNI Noise and Number Index
NR Noise Rating
NRC National Research Council (United States, Canada)
ONAC Office of Noise Abatement and Control of the US EPA
OSHA Occupational Safety and Health Administration
Pa Pascal, the unit of pressure
PAHO Pan American Health Organization
PHE Department for Protection of the Human Environment, WHO, Geneva
PNL Perceived Noise Level
PSIL Preferred Speech Interference Level
PTS Permanent Threshold Shift
RASTI Rapid Speech Transmission Index
RC Room Criterion
SABS South African Bureau of Standards
SEL Sound Exposure Level
STC Sound Transmission Class
STI Speech Transmission Index
TTS Temporary Threshold Shift
UK United Kingdom
UN United Nations
UNDP United Nations Development Programme
UNECE United Nations Economic Commission for Europe
Appendix 5: Equations and other technical information

Basic acoustical measures

**Sound Pressure Level**

The time-varying sound pressure will completely define a sound in a given location. The sound pressure range is wide within which human listeners can receive \((10^{-5} - 10^{2}\, \text{N/m}^2)\). Therefore, it is practical to measure sound pressure level on a logarithmic scale. Sound intensity level is defined as 10 times the logarithm (to the base 10) of the ratio of the sound intensity of a target sound to the sound intensity of another (reference) sound. Sound intensity is proportional to the squared sound pressure because the static mass density of the sound medium as well as the speed of sound in this medium are invariant. The sound pressure level \(L_P\) of a sound may be expressed as a function of sound pressure \(p\) and is, thus, possible to measure:

\[
L_P = 10 \log_{10} \left( \frac{p}{p_{\text{ref}}} \right)^2
\]

For the purpose of measuring sound pressure level in a comparative way, the reference pressure, \(p_{\text{ref}}\), has an internationally agreed value of \(2 \times 10^{-5}\, \text{N/m}^2\) (earlier 20 \(\mu\text{Pa}\)). Sound pressure level is then expressed in decibel (dB) relative to this reference sound.

**Sound Pressure Level of Combined Sounds**

Whereas sound intensities or energies or pressures are additive, non-correlated time-varying sound pressure levels have first to be expressed as mean square pressure, then added, and then transferred to a sound pressure value again. For example, if two sound sources are combined, each of a sound pressure level of 80 dB, then the sound pressure level of the resulting combined sound will become 83 dB:

\[
L_P = 10 \cdot \log_{10} (10^8 + 10^8) = 10 \cdot \log_{10} (2 \cdot 10^8) = 10 \cdot (\log_{10} 2 + \log_{10} 10^8) = \\
10 \cdot (0.3 + 8) = 83
\]

It is only sounds with similar sound pressure levels that when combined will result in a significant increase in sound pressure level relative to the louder sound. In the example given above, a doubling of the sound energy from two sources will only result in a 3-dB increase in sound pressure level. For two sound sources that emit non-correlated time-varying sound pressures, this represents the maximum increase possible. The sound pressure level outcome, resulting from combining two sound pressure levels in dB, is displayed in Figure A.5.1.
Figure A.5.1: Estimate of combined sound levels

**Equivalent Continuous Sound Pressure Level**

Average sound pressure level is determined for a time period of interest, T, which may be an interval in seconds, minutes, or hours. This gives a dB-value in Leq that stands for equivalent continuous sound pressure level or simply sound level. It is derived from the following mathematical expression in which A-weighting has been applied:

\[
L_{Aeq,T} = 10 \log_{10} \left( \frac{1}{T} \int_0^T L_P(t)^{10} \, dt \right) \text{ [dBA]}
\]

Because the integral is a measure of the total sound energy during the period T, this process is often called “energy averaging”. For similar reasons, the integral term representing the total sound energy may be interpreted as a measure of the total noise dose. Thus, Leq is the level of that steady sound which, over the same interval of time as the fluctuating sound of interest, has the same mean square sound pressure, usually applied as an A-frequency weighting. The interval of time must be stated.

**Sound exposure level**

Individual noise events can be described in terms of their sound exposure level (SEL). SEL is defined as the constant sound level over a period of 1 s that would have the same amount of energy as the complete noise event (Ford 1987). For a single noise event occurring over a time interval T, the relationship between SEL and L_{Aeq,T} is,

\[
SEL = L_{Aeq,T} + 10 \log_{10} \left( \frac{T}{T_0} \right)
\]

In this equation \( T_0 \) is 1 s.
**Day and night continuous sound pressure level**

There are different definitions in different countries. One definition is (von Gierke 1975; Ford 1987):

\[ L_{dn} = L_{Aeq,16h} + L_{Aeq,8h} - 10 \text{ dBA} \]

Where \( L_{Aeq,16h} \) is the day equivalent sound pressure level and \( L_{Aeq,8h} \) is the night equivalent sound pressure level.

**Sound Transmission into and within buildings**

An approximate relationship between sound reduction index \( R \), the frequency \( f \), the mass per unit area of the panel \( m \) in kg/m\(^2\), and the angle of incidence \( \theta \) is given by

\[ R(\theta) = 20 \log(f m \cos(\theta)) - 42.4, \text{ (dB)} \]

This relationship indicates that the sound reduction index will increase with the mass of a panel and with the frequency of the sound as well as varying with the angle of incidence of the sound. It is valid for limp materials but is a good approximation to the behavior of many real building materials at lower frequencies.

The sound reduction index versus frequency characteristics are usually complicated by a coincidence dip which occurs around the frequency where the wavelength of the incident sound is the same as the wavelength of bending waves in the building façade material. The frequency at which the coincidence dip occurs is influenced by the stiffness of the panel material. Thicker, and hence stiffer materials, will have coincidence dips that are lower in frequency than less stiff materials. Figure A.5.2 plots measured sound reduction index values versus frequency for 4 mm thick glass and illustrates the coincidence dip for this glass at a frequency centered just above 3 kHz.
Figure A.5.2: Sound reduction index versus frequency for single and double layers of 4 mm glass (air separation 13 mm).

As also illustrated in Figure A.5.2 for two layers of 4 mm glass, the low frequency sound reduction can be severely limited by the mass-air-mass resonance. This resonance is due to the combination of the masses of the two layers and the stiffness of the enclosed air space. As the Figure A.5.2 example shows, this resonance can often dramatically reduce the low frequency sound reduction of common double window constructions.

The sound reduction of various building constructions can be calculated as the difference between the average sound levels in the two rooms ($L_1 - L_2$) plus a correction involving the area of the test panel ($S$) in $\text{m}^2$ and the total sound absorption ($A$) in $\text{m}^2$ in the receiving room,

$$R = L_1 - L_2 + 10 \log \left\{ \frac{S}{A} \right\} \text{ [dB]}.$$  

For outdoor-to-indoor sound propagation, the measured sound reduction index will also depend on the angle of incidence of the outdoor sound as well as the position of the outdoor measuring microphone relative to the building façade,

$$R = L_1 - L_2 + 10 \log \left\{ 4S \cos(\theta) / A \right\} + k \text{ [dB]}.$$  

When the outdoor incident sound level $L_i$ is measured with the outdoor microphone positioned against the external façade surface, measured incident sound pressures will be 6 dB higher due to pressure doubling. This occurs because the incident sound and reflected sound arrive at the microphone at the same time. If the external microphone is located 2 m from the façade, there will not be exact pressure doubling but an approximate doubling of the measured sound energy corresponding to a 3 dB increase in sound level. The table below indicates the appropriate values of $k$ to be used in the above equation, depending on the location of the outdoor microphone, to account for sound reflected from the façade.

<table>
<thead>
<tr>
<th>$k$</th>
<th>$L_i$ description</th>
</tr>
</thead>
<tbody>
<tr>
<td>$k = 0$, dB</td>
<td>$L_i$ does not include reflected sound.</td>
</tr>
<tr>
<td>$k = -3$, dB</td>
<td>$L_i$ measured 2 m from façade and includes reflected energy.</td>
</tr>
<tr>
<td>$k = -6$, dB</td>
<td>$L_i$ measured at the façade surface and includes pressure doubling effect.</td>
</tr>
</tbody>
</table>
Appendix 6: Participant list of THE WHO Expert Task Force meeting on Guidelines For Community Noise, 26-30 April 1999, MARC, London, UK

Professor Birgitta Berglund, Department of Psychology, Stockholm University, S-10691 Stockholm, Sweden, Tel: +46 8 16 3857, Fax: +46 8 16 5522, Email: birber@mbox.ki.se.

Dr. Hans Bögli, Bundesamt für Umwelt, Wald und Landschaft (BUWAL), Abteilung Lärmbekämpfung, CD 3003 Bern, Switzerland, Tel: +41 31 322 9370, Fax: +41 31 323 0372, Email: hans.boegli@buwal.admin.ch.

Dr. John S. Bradley, Manager, Acoustics Subprogram, Indoor Environment Program, National Research Council Canada, Ottawa, KIA OR6, Canada, Tel: +1 613 993 9747, Fax: +1 613 954 1495, Email: john.bradley@nrc.ca.

Dr. Ming Chen, Department of Otolaryngology, Fujian Provincial Hospital, N° 134 East Street, Fuzhou 350001, People's Republic of China, Tel: +86 0591 755 7768-365(258) office, 755 6952 home, Fax: +86 0591 755 6952, Email:

Lawrence S. Finegold, Air Force Research Laboratory, AFRL/HECA, 2255 H Street, Wright-Patterson AFB, OH 45433-7022, USA, Tel: +1 937 255 7559, Fax: +1 937 255-9198, Email: Larry.Finegold@he.wpafb.af.mil.

Etienne Grond, P.O. Box 668, Messina 0900, South Africa, Tel: +27 15 575 2031, Fax: +27 15 575 2025, Email: egrond@debeers.co.za.

Professor Andrew Hede, University of the Sunshine Coast, Sippy Downs, Maroochydore South, Qld. 4558, Australia, Tel: +61 7 5430 1230, Fax: +61 7 5430 1231, Email: hede@usc.edu.au.

Professor Gerd Jansen, Institut für Arbeitsmedizin der Medizinischen Einrichtungen der Heinrich-Heine-Universität Düsseldorf, Kirchfeldstraße 35, D-40217 Düsseldorf, Germany, Tel: +49 211 919 4985 (O.), +49 211 403 123 (R.), Fax: +49 211 919 3989, Email: Jan.G2t-online.de

Dr. Michinori Kabuto, Director, Env. Risk Research Division, National Institute for Environmental Studies, 16-2 Onogawa, Tsukuba, Ibaraki 305, Japan, Tel: +81 298 50 2333, Fax: +81 298 50 2571, Email: kabuto@nies.go.jp/mkabuto@msn.com.

Professor Thomas Lindvall, National Institute of Environmental Medicine and Karolinska Institutet, PO Box 210, S-17177 Stockholm, Sweden, Tel: +46 8 728 7510, Fax: +46 8 33 22 18, Email: Thomas.Lindvall@imm.ki.se.

Dr. Amanda Niskar, CDC/NCEH, 4770 Buford Highway, NE, Mailstop F-46, Atlanta, Georgia 30341-3724, USA, Tel: +1 770 488 7009, Fax: +1 770 488 3506, Email: abnt0@cdc.gov.
Dr Sudhakar B. Ogale, Professor and Head, Dept. of Otolaryngology, G.S. Medical College and KEM Hospital, Parel, Mumbai 400012, India, Tel: +91 22 413 6051 Ext ENT, Home +91 22 414 4329, Fax: +91 22 414 3435, Email:

Mrs. Willy Passchier-Vermeer, TNO Prevention and Health, P. O. Box 2215, 2301CE Leiden, The Netherlands, Tel: +31 715 181 786, Fax: +31 715 181 920, Email: w.passchier@tg.tno.nl

Professor Shirley Thompson, Epidemiologist, Dept. of Epidemiology and Biostatistics, School of Public Health, University of South Carolina, Columbia, SC 29208, USA, Tel: +1 803 777-7353/5056, Fax: +1 803 777-2524, Email: Sthompson@sph.sc.edu.

Max Thorne, National Environmental Noise Service, P.O. Box 6157, Rotorua, New Zealand, Tel.: +64 7 36 28 956, Fax: +64 7 362 8753, E-mail: max.thorne@hotmail.com.

Frits van den Berg, Science Shop for Physics, University of Groningen, Nijenborgh 4, 9747 AG Groningen, The Netherlands, Tel: +31 50 363 4867, Fax: +31 50 363 4727, Email: nawi@phys.rug.nl.

Professor Shabih Haider Zaidi, Chairman, Dept. of ENT Surgery, Dow Medical College, Karachi, Pakistan, Tel: +92 21 583 1197 or 583 3311, Fax: +92 21 568 9258/671 264, Email: anzaidi@cyber.net.pk.

WHO Secretariat

Mr Dominique Francois, WHO Regional Office for Europe, Scherfigsvej 8, DK-2100 Copenhagen O, Denmark, Tel: +45 39 17 14 27, Fax: +45 39 17 18 18, Email: xbo@who.dk.

Dr. Dietrich Schwela, Occupational and Environmental Health (OEH), World Health Organization, 20 Avenue Appia, CH-1211 Geneva 27, Tel: +41 22 791 4261, Fax: +41 22 791 4123, Email:schwelad@who.int.

King's College London

Professor Peter Williams, Director MARC, King's College London, W8 7AD, UK, Tel: +44 171 842 4004, Fax: +44 171 848 4003, Email: peter.williams@kcl.ac.uk.

Observer

Bernard F. Berry, Head of Noise Standards, Centre for Mechanical and Acoustical Metrology, National Physical Laboratory, Teddington, Middlesex TW11 OLW, United Kingdom, Tel: +44 (0)181 943 6215, Fax: +44 (0)181 943 6217, Email: bernard.berry@npl.co.uk.
Wind Energy & Wind Park Siting and Zoning Best Practices and Guidance for States

NARUC Grants & Research

January 2012

A report for the Minnesota Public Utilities Commission Funded by the U.S. Department of Energy
The report you are reading was created under the State Electricity Regulators Capacity Assistance and Training (SERCAT) program, a project of the National Association of Regulatory Utility Commissioners (NARUC) Grants & Research Department. This material is based upon work supported by the Department of Energy under Award Number DE-OE0000123.

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Please direct questions regarding this report to Miles Keogh, NARUC’s Director of Grants & Research, mkeogh@naruc.org; (202) 898-2200.

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Put It There! –
Wind Energy & Wind-Park Siting and Zoning
Best Practices and Guidance for States

Tom Stanton
Principal for Electricity

January 2012
12-03
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Any inaccuracies, mistakes, or omissions are my responsibility. Comments, corrections, editorial guidance, and new information to update this report and the survey results are welcome. Comments can be submitted to:

Tom Stanton, Principal for Electricity
National Regulatory Research Institute
tstanton@nrri.org (517) 775-7764
Online Access

This paper can be accessed online via the National Regulatory Research Institute website at http://www.nrri.org/pubs/electricity/NRRI_Wind_Siting_Jan12-03.pdf.

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Executive Summary

Siting and zoning of new utility-scale wind energy facilities (called “wind parks” in this report) can be complicated and is often contentious, due to local opposition. Citizens are frequently worried about the changes to the landscape that will occur if utility-scale wind turbines are sited nearby. Such wind turbines are tall, rather imposing structures. Their construction often represents a significant change to what were previously open rural and agricultural landscapes.

Wind siting and zoning are influenced by preexisting laws and administrative rules, renewable energy support policies, and public acceptance. But often, planning and zoning officials with no previous expertise in wind energy systems have to develop the rules and regulations that will ultimately guide local wind power siting and zoning decisions. Those rules then, for better or worse, directly affect the planning, design, development, construction, and operations of wind parks.

Development of wind parks in areas with promising wind resources is economically favorable when compared with other types of renewable energy sources. In part because 37 states have adopted policies that set either mandates or goals for increasing the use of renewable energy, wind-park development in the U.S. has been growing steadily. The growth continues, despite controversy in specific jurisdictions. By late 2011, the U.S. had 42,432 MW of installed wind energy capacity and 14 states had more than 1,000 MW each.

This report summarizes the wind energy siting and zoning practices in all 50 states and the District of Columbia. Part I briefly reviews the current status of wind energy development in the U.S.

Part I.A reports on a survey conducted of each state’s wind energy siting and zoning practices. The completed surveys are presented in Appendix A. Table ES-1 (pp. ES-3–7) summarizes the survey data. Specific data reviewed and reported in Part I.A includes:

- What agencies have responsibility for wind siting and zoning decisions, and are they state or local government agencies, or both?

Summary data is shown in Table ES-1, columns 3, 4, and 5. The primary decision-making authority, as reported in column 3, resides with local governments in 26 states and state governments in 22 states. Florida and Iowa have shared local and state responsibility. Column 4 includes a “(P)” to indicate that a state agency has primary siting authority. Many states have a clearly defined secondary authority, as indicated by “(S)” in Column 4. In six states plus the District of Columbia the public utility commission (generically, the PUC) is responsible for siting and zoning utility-owned wind parks. Altogether, 23 states and the District of Columbia require a certificate to be issued by the PUC prior to wind park construction. Eleven other states, indicated with a “Y” in column 5, have an energy facility siting authority that is separate from the PUC. Data reported in columns 3 or 4 reports if the state-level jurisdiction is contingent upon the size of the wind park.

- Which overriding rule, established by the state’s constitution, governs the division between state and local government jurisdiction in the state? Is it “Home Rule,” where local governments retain all decision-making authority except that explicitly granted to the state? Or is it “Dillon’s Rule,” where the state government retains all decision-making authority except that explicitly granted to the local governments?

That data is reported in Table ES-1, column 6. A general expectation might be that Home Rule states would tend to have local authority and Dillon’s Rule states would tend to have state authority for wind siting and zoning. In practice, though, Home Rule states are evenly split in terms of local versus state authority, but more Dillon’s Rule states (20 of 31) have already delegated wind siting and zoning
authority to local units of government.

- How many and which states have developed mandatory evaluation criteria, voluntary guidelines, model ordinances, and setback or sound standards for wind parks? How many local governments in each state have already adopted wind siting and zoning ordinances?

These data are shown in Table ES-1, columns 7 through 12. Slightly more than half the states have published lists of the criteria that are used to evaluate wind siting and zoning conditions. Ten states have published voluntary guidelines for wind parks. Table ES-2 (p. ES-8) reports on the major factors included in each state’s guidelines.

Five states, labeled “Y” in Table ES-1, column 9, have published model ordinances intended to guide local governments. As shown in Table ES-1, columns 10 and 11, a handful of states have published setback standards, sound standards, or both. Both of these columns differentiate between mandatory standards, indicated as “Y,” and recommended or advisory standards for local government consideration, indicated as “Model.” Table ES-1, column 12, reports the number of local ordinances that have been discovered and included in a database being assembled by the National Renewable Energy Laboratory.

- How many and which states have supporting policies, such as clean energy portfolio standards and goals, policies promoting the development of in-state wind energy facilities, and renewable energy zones?

These data are shown in Table ES-1, columns 13, 14, and 15. As shown in column 13, 29 states and the District of Columbia have renewable energy portfolio standard (RPS) mandates (M), and eight states have renewable energy goals (G). Of those 37 states with RPS mandates or goals, 29 have enacted policies that are specifically intended to promote the development of in-state renewable resources, including wind parks. Those policies are encoded with one, two, or three letter codes. In column 14: “B” means a “bonus” credit for at least some in-state facilities; “D” means electricity must be delivered into the state (or “DR” means delivered into the region) in order to qualify as eligible to count for RPS compliance; “L” means a maximum limit on energy from out-of-state facilities or conversely a minimum limit (often called a “carve-out”) on energy from particular kinds of in-state resources; “M” means a mandate for in-state generators; “R” means a mandate for regional generators (usually, in the territory served by a regional transmission organization, RTO); “S” means qualifying facilities must be in the service territory of a utility providing retail service in the state; and “U” means a mandate for a utility serving the state to own or contract for the qualifying renewable energy.

Another policy that indirectly supports wind-park siting and zoning is the development of renewable energy zones. This is reported in Table ES-1, column 15. Typically, a renewable energy zone (REZ) is identified through a planning process that includes a general review of wind resources and broad-based, regional land-use compatibility with wind-park development, combined with electric transmission system modeling and planning. In most REZ processes, once specific zones are identified, transmission will be built to interconnect the zone to electricity loads, in anticipation that wind-park development will follow. States with explicit state-level REZ processes include California, Colorado, Michigan, and Texas. These are indicated with a “Y” in column 15. Many other states and utilities are participating in REZ-like transmission modeling and planning under the auspices of regional transmission organizations. These include the Midwest Independent [Transmission] System Operator Regional Generation Outlet Studies (RGOS), and the Western Renewable Energy Zone (WREZ) initiative.
Table ES-1: Summary of State Wind Siting and Zoning Practices

| State         | MW Installed | Primary Authority (Unit) | Primary (P) or Secondary (S) State Authority | State Energy Siting | Primary Rule | Evaluation Criteria | Voluntary Guidelines | Model Ordinance | Setback Standard | Sound Standard | Local Ordinances | RPS | RPS In-State “Tilt” | REZ |
|---------------|--------------|--------------------------|---------------------------------------------|--------------------|--------------|-------------------|---------------------|-------------------|----------------|---------------|---------------|----------------|-----|-------------------|-----|
| Alabama       | 0            | State CPCN from PSC (P)  | Dillon’s                                    |                    |              |                   |                     |                   |                |               |               |                |     |                   |     |
| Alaska        | 10           | State CPCN from RCA (P)  | Home                                        |                    |              |                   |                     |                   |                |               |               |                |     |                   |     |
| Arizona       | 128          | Local CPCN from PSC (S)  | Dillon’s                                    | Y W               |              |                   |                     |                   |                |               |               |                |     |                   |     |
| Arkansas      | 0            | Local CPCN from PSC (S)  | Home                                        |                    |              |                   |                     |                   |                |               |               |                |     |                   |     |
| California    | 3,599        | Local California Environmental Quality Act (S) | Dillon’s | Y |              |                     |                   |                   |                |               |               |                |     |                   |     |
| Colorado      | 1,299        | Local CPCN from PUC (>2MW) (S), PUC consults with Division of Wildlife (S) | Dillon’s | Y |              |                     |                   |                   |                |               |               |                |     |                   |     |
| Connecticut   | 0            | State CPCN from PUC (>1 MW) (<1 MW) (P), D EEP checks congruence with IRP (S) | Y Home | Y |              |                     |                   |                   |                |               |               |                |     |                   |     |
| Delaware      | 2            | Local Certification from PSC (S) | Dillon’s | Y |              |                     |                   |                   |                |               |               |                |     |                   |     |
| District of Columbia | 0 | PUC Approval from PSC (P) | n/a | |              |                     |                   |                   |                |               |               |                |     |                   |     |
| Florida       | 0            | State CPCN from URC (S)  | Y12                                          | Y                 |              |                   |                     |                   |                |               |               |                |     |                   |     |
| Georgia       | 0            | Local                        | Dillon’s                                    | Y W               |              |                   |                     |                   |                |               |               |                |     |                   |     |
| Hawaii        | 93           | Local Permit from PUC (S)   | Dillon’s                                    |                    |              |                   |                     |                   |                |               |               |                |     |                   |     |
| Idaho         | 471          | Local                        | Dillon’s                                    |                    |              |                   |                     |                   |                |               |               |                |     |                   |     |
| Illinois      | 2,436        | Local                        | Home                                        |                    |              |                   |                     |                   |                |               |               |                |     |                   |     |
| Indiana       | 1,339        | Local                        | Home                                        |                    |              |                   |                     |                   |                |               |               |                |     |                   |     |

1 See all table notes at the end of the table, on page ES-7. See Appendix A for more detailed information about each state’s practices.
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<td>RPS In-State “Tilt”&lt;sup&gt;9&lt;/sup&gt;</td>
<td>REZ&lt;sup&gt;10&lt;/sup&gt;</td>
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<tr>
<td>Nebraska</td>
<td>294</td>
<td>State (&gt;80MW)&lt;sup&gt;12&lt;/sup&gt;</td>
<td>Approval from Nebraska Power Review Board (&gt;80MW)&lt;sup&gt;12&lt;/sup&gt; (P)</td>
<td>Dillon’s</td>
<td>Y</td>
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<td></td>
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<td>North Dakota</td>
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<td>State (&gt;0.5MW)</td>
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### Table ES-1 (Continued): Summary of State Wind Siting and Zoning Practices

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<th>State Energy Siting</th>
<th>Primary Rule</th>
<th>Evaluation Criteria</th>
<th>Voluntary Guidelines</th>
<th>Model Ordinance</th>
<th>Setback Standard</th>
<th>Sound Standard</th>
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<th>RPS In-State “Tilt”</th>
<th>REZ</th>
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<td>G</td>
<td>RGOS</td>
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<td>Projects must register with PUC (S)</td>
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<td>G</td>
<td>R</td>
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<td>State</td>
<td>COPG from PSB (P)</td>
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<td>Virginia</td>
<td>0</td>
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<td>Permit from DEQ ≤100 MW (S), SCC &gt;100 MW (S)</td>
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<td>Y</td>
<td>Y</td>
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<td>State (≥350MW)</td>
<td>Site Certification Agreement from Energy Facility Site Evaluation Council (≥350MW) (P)</td>
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<td></td>
<td></td>
<td>M</td>
<td>DR</td>
<td>GBS, WREZ</td>
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<td>CPCN from PSC (≥100MW) (S)</td>
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<td></td>
<td></td>
<td>4</td>
<td>M</td>
<td>D</td>
<td>RGOS</td>
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<td>Wyoming</td>
<td>1,412</td>
<td>State (≥30 turbines)</td>
<td>Permit from Industrial Siting Council (≥30 turbines) (P)</td>
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<td>Dillon’s</td>
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<td>Y</td>
<td>4</td>
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ES-6
## Table ES-1 (Continued): Summary of State Wind Siting and Zoning Practices

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<td>State Energy Siting</td>
<td>Primary Rule</td>
<td>Evaluation Criteria</td>
<td>Voluntary Guidelines</td>
<td>Model Ordinance</td>
<td>Setback Standard</td>
<td>Sound Standard</td>
<td>Local Ordinances</td>
<td>RPS</td>
<td>REZ</td>
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<tr>
<td><strong>Note</strong>:</td>
<td>Table Notes: See also the individual survey reports for each state, presented in alphabetical order by state name, in Appendix A.</td>
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<td>1</td>
<td>Source data for Column 2 is Figure 1 (p. 3).</td>
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<tr>
<td>2</td>
<td>Column 3 indicates “Local” when the primary siting authority rests with the local (county or municipal) government or “State” when primary authority is with the state. Any “Limit” means that a wind-park size criterion (number of turbines in Wyoming, acres in Maine, or capacity – number of MW – in 14 states) determines jurisdiction. In those circumstances, wind parks larger than the expressed limit trigger state authority. “Both” applies to Iowa and New Jersey, where siting authority is held by both the state and local units of government.</td>
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<td>3</td>
<td>Column 5: “Y” for yes indicates there is a state energy facility siting council or board separate from the state public utility commission.</td>
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<td>4</td>
<td>Column 6 distinguishes between “Home Rule” states and “Dillon’s Rule” states. See p. 10 for the discussion.</td>
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<td>5</td>
<td>Columns 7 and 8: “Y” means yes, the state does have mandatory evaluation criteria (Column 7) or voluntary guidelines (Column 8). A “W” in either column means primarily or exclusively for wildlife. States with both Y and W in either column means multiple documents exist, one focused explicitly on wildlife.</td>
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<td>6</td>
<td>Columns 10 and 11: “Y” indicates that standards are included in evaluation criteria. “Model” means that criteria are included in a model ordinance.</td>
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<td>9</td>
<td>Column 14: Many state RPS programs include provisions to promote in-state renewable energy facilities, such as wind parks. A recent NRRI Report (Grace, Donovan, &amp; Melnick, 2011) calls this a “tilt” policy (intended to tilt the playing field towards certain technologies). In Column 14: “B” means a “bonus” credit for at least some in-state facilities; “D” means electricity must be delivered into the state (or “DR” means delivered into the region) in order to qualify; “L” means a maximum limit on energy from out-of-state facilities or conversely a minimum limit on energy from particular kinds of in-state resources; “M” means a mandate for in-state generators; “R” means a mandate for regional generators; “S” means qualifying facilities must be in the service territory of a utility providing retail service in the state; and “U” means a mandate for a utility serving the state to own or contract for the qualifying renewable energy. Source: Database of State Incentives for Renewables &amp; Efficiency, 2011, <a href="http://www.dsireusa.org/incentives/index.cfm?SearchType=RPS&amp;EE=0&amp;RE=1">http://www.dsireusa.org/incentives/index.cfm?SearchType=RPS&amp;EE=0&amp;RE=1</a>, retrieved 5 Jan 2012.</td>
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<td>10</td>
<td>Column 15: REZ means Renewable Energy Zone(s). Coding indicates “Y” if there is a specific state process for determining zones (in Texas, Colorado, Utah, Michigan, and Nevada). Other codes include: “WREZ” for the Western Renewable Energy Zones process for 5 states; “RGOS” for the Regional Generation Outlet Study process at the Midwestern Independent [Transmission] System Operator (MISO) for parts or all of 12 states; “GBS” for the Gorge Bi-State Renewable Energy Zone, which includes six counties near the Columbia River in both Oregon and Washington.</td>
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<td>11</td>
<td>Wisconsin’s Model Ordinance applies only for small wind systems, &lt;100kW in capacity.</td>
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<tr>
<td>12</td>
<td>Nebraska’s &gt;80MW limit applies only if the planned capacity would cause the utility’s total renewable energy production to exceed the company’s goal.</td>
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<tr>
<td>13</td>
<td>Maine’s state authority applies if the proposed wind park involves more than 20 acres of land, or if the wind park will be sited in an “unorganized” area.</td>
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ES-7
Table ES-2: Factors Included in State Wind Siting and Zoning Guidelines

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Part I.B briefly reviews the nature of wind-park opposition and lists the major concerns that are usually raised. When engaging in siting and zoning procedures, anti-wind groups and individuals arm themselves with information obtained from anti-wind web sites. Examples include AWEO (www.aweo.org), Industrial Wind Action Group (www.windaction.org), and National Wind Watch (www.wind-watch.org).1

Ubiquitous internet access among local activists facilitates the dissemination of anti-wind documents and thereby tends to focus all local anti-wind groups on the same basic issues and concerns. Table ES-3 summarizes many of the objections raised by opposition groups. In Table ES-3, *italic font* denotes recommendations for the role that each set of objections ought to play in siting and zoning decisions.

Part II summarizes best practices for the procedures used to manage wind energy siting and zoning. The report recognizes that best practices are subject to refinement over time, as more knowledge is gained and as wind generator technologies change and improve. These recommendations are based on data reported from the survey of state policies and procedures, literature review, and the knowledge and experience of the author. The recommendations are summarized in Table ES-4.

Part III presents guidelines for wind power development, including recommended approaches to critical issues: noise; shadow flicker; ice throw; wildlife; aesthetics; competing land uses; permit requirements for meteorological (met) towers, construction, and facility safety; and decommissioning. Table ES-5 summarizes recommended approaches towards and applying setback distances in response to each of those major criteria.

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1 Website home pages retrieved 12 Dec 2011.
Table ES-3: Typology of Anti-Wind Park Arguments

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<thead>
<tr>
<th>Topics and Subtopics</th>
<th>Example of anti-wind characterization. Siting and Zoning Relevance.</th>
</tr>
</thead>
</table>
| Human Health, Nuisance, and Annoyance Factors | “[W]ind farms produce a noise that’s hard to comprehend and even more dangerous to live close to. The beating of the blades have not only their own throbbing sounds, but beat harmonically together to create a cacophony of audible confusion…” (Brougher, 2008).  
“[B]ased on our knowledge of the harmful effects of noise on children’s health and the growing body of evidence to suggest the potential harmful effects of industrial wind turbine noise, it is strongly urged that further studies be conducted…before forging ahead in siting industrial wind turbines.” (Bronzaft, 2011).  
“Dizziness (specifically, vertigo) and anxiety are neurologically linked phenomena. Hence the anxiety and depression seen in association with other symptoms near wind installations are not a neurotic response to symptoms, but rather a neurologically linked response to the balance disturbances people experience from shadow flicker or low-frequency noise…. Based on these health effects and hazards, turbines should not be placed within 1700 feet of any road or dwelling. Those living within 1/2 mile (2640 ft) should be apprised that they are likely to experience very bothersome levels of noise and flicker, which continue (though to a lesser degree) to a mile or more from the turbines.” (Pierpont, 2005).  
Windparks should not be singled out for special noise criteria. Siting and zoning can apply noise criteria, but noise limits should apply equally to all sources. Separate consideration should be given to construction noise.  
It is a simple matter to calculate the precise locations and maximum annual duration of shadow-flicker effects. A siting standard can limit shadow flicker.  
Both noise and shadow-flicker complaints can be amenable to mitigation, and an escrow account subject to independent management by an objective, disinterested arbitrator can be established for this purpose.  
Neighbors should have the right to waive noise and shadow-flicker standards. |
| Noise | “The bottom line is that ice, debris or anything breaking off the wind turbine blades (including the blades themselves) can impact a point almost 1,700 feet away from the base of the turbine” (Matilsky, 2011).  
“Especially in the mountainous sites or in the northern areas icing may occur frequently and any exposed structure – also wind turbines – will be covered by ice under special meteorological conditions. This is also true if today's Multi Megawatt turbines with heights from ground to the top rotor blade tip of more than 150 m can easily reach lower clouds with supercooled rain in the cold season, causing icing if it hits the leading edge.” (Siefert, Westerhellweg, & Kroning, 2003).  
“The wind turbines are being whipsawed and hammered to pieces constantly, and the public is not being made aware of this real and present danger, for fear there will be a grass-roots uprising against it before they are saddled with [wind parks] and don’t have any more say-so in the matter.” (Brougher, 2008).  
Tower failure for utility-scale turbines is characterized by vertical collapse (like a beverage can crushing when stepped on), rather than tipping over from the base. Tower construction standards should guide setback distances, rather than the remote possibility of tower tip-over.  
Ice throw and blade failure resulting in parts hurtling through the air are increasingly rare. Modern turbines are continuously monitored in real time and will shut themselves down if ice accumulates on blades. Ice shedding is thus almost exclusively limited to the zone directly underneath the turbine. |
<p>| Infrasound |  |
| Shadow flicker |  |</p>
<table>
<thead>
<tr>
<th>Topics and Subtopics</th>
<th>Example of anti-wind characterization. <em>Siting and Zoning Relevance.</em></th>
</tr>
</thead>
</table>
| **Safety** (continued) | Setback distances of 1.5 times turbine height (tower plus blade) should be considered maximal. Neighbors should have the right to waive setback distances from "participating" buildings and property lines. Wind-park owners (and insurers) should be liable for damages caused by ice throw, blade failure, and tower failure. 
*An escrow account should cover potential liability and decommissioning costs.* |
| Ice-throw | |
| Blade failure | |
| Tower failure | |
| **Property Values** | “The days on market was more than double for those properties inside the windmill zones. The sold price was on average $48,000 lower inside the windmill zones than those outside. The number of homes not absorbed (not sold) was 11% vs. 3%.” (Luxemburger, n.d.). |
| Visual amenity | “There are people who can’t sell their homes and are forced to rent other living accommodation and people who sell their homes to the wind energy companies at much reduced prices and then are ‘gagged’ from talking about any of the negative health effects” (Chevalier, n.d.). |
| Sense of place, of community | “The degradation these enormous sprawling industrial complexes bring to our cultural and visual resources is least understood. Our colleagues… describe West Texas today as an alien landscape where one can drive for miles and miles and miles (and miles) and see nothing but wind turbines. The nighttime experience is even more surreal with the blinking red lights.” (Industrial Wind Action Group, 2005). |
| Industrial appearance | |
| Tourism impacts | |
| **Wildlife and Natural Features** | “Where’d all the animals go? My guess is as far away from those things as they can get.” (Brougher, 2008). |
| Avian mortality (birds and bats) | “Save the Eagles International wishes to warn the international community about the threat that windfarms and their power lines represent for biodiversity. Unlike cars, buildings, and domestic cats, wind turbine blades and high tension lines often kill protected or endangered birds like eagles, cranes, storks, etc. Cumulatively and over the long term, 3.5 million wind turbines to be installed worldwide will cause the extinction of many bird species, some of them emblematic.” (Duchamp, 2011). |
| Habitat destruction, fragmentation | |
| **Energy Policy** | “The erratic nature of the wind means that turbines simply cannot supply the base load that other forms of generation do. Those other generators will continue to be needed to back up the wildly variable output of wind turbines, with the probability that in so doing these plants will actually emit more pollution for each kilowatt-hour they generate than if they were allowed to operate normally.” (Roberson, 2004). |
| Capacity factor | “[S]ome reliable, dispatchable generating unit(s) must be immediately available at all times -- and operating at less than peak efficiency and capacity -- to "back up" the unreliable wind generation. The reliable, backup unit(s) must ramp up and down to balance the output from the wind turbines. … Wind turbines have virtually no ‘capacity value.’ Thus, electric customers pay twice: once for the wind energy and again for reliable capacity.” (Schleede, 2005). |
| Emissions effects | |
| Integration costs | |
| Reliability | |

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**Table ES-3 (Continued): Typology of Anti-Wind Park Arguments**
Table ES-3 (Continued): Typology of Anti-Wind Park Arguments

<table>
<thead>
<tr>
<th>Topics and Subtopics</th>
<th>Example of anti-wind characterization. Siting and Zoning Relevance.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Energy Policy</strong> (continued)</td>
<td>“Peak power… during the hottest summer months… [is] far more demanding on the power grid, yet the wind power available in the winter months… is on average greater than in the summer. That’s a huge contradiction… . Nor can we store wind power… . So for the most part, winter winds and spring storms must either be wasted, or they will create surges which blow out the transformers, power equipment, and burn up their own generators, and set the grid back hundreds of millions of dollars, as has happened by wind surges in Oregon, and many times in Denmark, Germany, and other nations…” (Brougher, 2008).</td>
</tr>
<tr>
<td></td>
<td>“In high winds, ironically, the turbines must be stopped because they are easily damaged.” (Brougher, 2008).</td>
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<tr>
<td></td>
<td>“A nuclear plant is tens of times cheaper and thousands of times safer per [terawatt-hour] than gigantic air turbines will ever be – even if we learn someday how to prevent them from burning up, blowing the grid, and folding in half under a high wind load, and blending our birds with the landscape.” (Brougher, 2008).</td>
</tr>
<tr>
<td></td>
<td>The only relevance to siting and zoning might be for substations and transmission facilities, which also need approvals. None of these other issues are siting and zoning issues, per se.</td>
</tr>
<tr>
<td><strong>Economic Development</strong></td>
<td>“Tax avoidance – not environmental and energy benefits – has become the prime motivation for building ‘wind farms.’ … ‘Wind farms’ produce few local economic benefits and such benefits are overwhelmed by the higher costs imposed on electric customers through their monthly bills. … When the expected contribution of wind energy toward supplying US energy requirements is taken into account, wind energy is among the most heavily subsidized of all energy sources.” (Schleede, 2005).</td>
</tr>
<tr>
<td>Subsidies, Employment</td>
<td>“[I]nvestment dollars going to &quot;renewable&quot; energy sources would otherwise be available… for other purposes that would produce greater economic benefits. ‘Wind farms’ have very high capital costs and relatively low operating costs compared to generating units using traditional energy sources. They also create far fewer jobs, particularly long-term jobs, and far fewer local economic benefits. ‘Wind farms’ are simply a poor choice if the goals are to create jobs, add local economic benefits, or hold down electric bills.” (Schleede, 2011).</td>
</tr>
<tr>
<td></td>
<td>“[B]illions of [federal grant] dollars… – all of it exempt from federal corporate income taxes – is being used to fatten the profits of some of the world’s biggest companies” (Bryce, 2011).</td>
</tr>
<tr>
<td></td>
<td>These are not relevant siting and zoning concerns.</td>
</tr>
</tbody>
</table>
Table ES-4: Best Practices for Procedures

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. Develop procedures that result in clarity, predictability, and transparency</td>
<td>Jurisdictions with locations suitable for commercial wind development should anticipate interest and proceed to develop and publish siting and zoning procedures, principles, and guidelines.</td>
</tr>
<tr>
<td>2. Establish a one-stop, pre-submission consultation</td>
<td>Provide basic information for applicants in a single meeting, identifying and explaining the basics of all necessary permits and approvals.</td>
</tr>
<tr>
<td>3. Identify and map constrained and preferred wind energy development zones</td>
<td>Make available and accessible to the interested public GIS maps of exclusion, avoidance, and preferred development zones.</td>
</tr>
<tr>
<td>4. Include preferred development zones in transmission plans</td>
<td>Begin modeling and planning for wind power interconnections in preferred development zones as soon as the zones are identified.</td>
</tr>
<tr>
<td>5. Prepare and make available guidelines for participants</td>
<td>Explain procedures and timelines for when, where, and how to participate in public hearings. Provide information about decisions already completed through rulemaking.</td>
</tr>
<tr>
<td>6. Prepare and make available for local siting and zoning officials guidelines, checklists, and model ordinances</td>
<td>Support local government decision makers by providing the best available technical resources.</td>
</tr>
<tr>
<td>7. Ensure the sequence for obtaining permits and approvals meets requirements to allow development of suitable projects</td>
<td>The sequence of events leading to approval or rejection of an application should entail a logical progression through the planning and design stages, prior to siting and zoning approval that allows construction to begin.</td>
</tr>
</tbody>
</table>

Table ES-5: Wind-Park Siting and Zoning Criteria, Recommended Approaches and Setback Distances

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Recommended approach</th>
</tr>
</thead>
</table>
| Noise, sound, and infrasound | • Noise standards should allow some flexibility.  
• Noise standards should vary depending on the area’s existing and expected land uses, taking into account the noise sensitivity of different areas (e.g., agricultural, commercial, industrial, residential).  
• Determine pre-construction compliance using turbine manufacturer’s data and best available sound modeling practices.  
• Apply a planning guideline of 40 dBA as an ideal design goal and 45 dBA as an appropriate regulatory limit (following Hessler’s proposed approach, 2011).  
• Allow participating land owners to waive noise limits.  
• Establish required procedures for complaint handling.  
• Identify circumstances that will trigger, and techniques to be used for: (a) mandatory sound monitoring; (b) arbitration; and (c) mitigation.  
• Do not regulate setback distance; regulate sound. |
| Shadow flicker | • Restrict to not more than 30 hours per year or 30 minutes per day at occupied buildings.  
• Allow participating land owners to waive shadow-flicker limits.  
• Allow the use of operational practices and mitigation options for compliance.  
• Do not regulate setback distance; regulate the duration of shadow flicker. |
Table ES-5 (Continued): Wind Park Siting and Zoning Criteria, Recommended Approaches and Setback Distances

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Recommended approach</th>
</tr>
</thead>
</table>
| Ice throw                                    | • Authorize demonstrated ice control measures.  
• Require wind-park to provide insurance and escrow funds to ensure compensation for proven damages resulting from ice throw.  
• Do not regulate setback distance; regulate ice throw. |
| Wildlife and habitat exclusion zones         | • Responsible wildlife protection agencies should use the best available scientific knowledge and data to determine exclusion and avoidance zones and appropriate buffers (that is, setback distances) beyond those zones.  
• Permits should specify required pre-, during-, and post-construction monitoring.  
• Permits should specify how mitigation requirements will be determined and what mitigation techniques will be considered.  
• Regulate setback distances as required by responsible wildlife protection agencies and do not authorize siting in exclusion and buffer zones. |
| Aesthetic requirements                       | • Require neutral paint color and minimal signage.  
• Require the minimum of nighttime lighting necessary to achieve FAA compliance.  
• Require that realistic visual impact assessments, accessible to the public, be included in wind park planning and applications.  
• Manage visual impact through setbacks and exclusions from critical competing land uses. |
| Critical competing land uses                 | • Map as excluded zones any special cultural, anthropological, “sacred” lands, and highly valued scenic vistas.  
• Apply reasonable setbacks from non-participating property lines, occupied buildings, scenic vistas, and transportation and utility rights-of-way.  
• Allow participating properties to at least partially waive setback requirements from property lines and occupied buildings, in writing. |
| Permit requirements for met towers, construction, and facility safety | • Predetermine requirements and simplify procedures for approving meteorological (met) towers.  
• Regulate heavy construction requirements the same as any other heavy construction project, using the regulatory permitting system (e.g., for stormwater, surface water, transportation, noise, and wetlands permits).  
• Check for all required approvals for potential interference with radio and TV reception or radar. Provide for testing and mitigation of radio and TV interference problems that do occur.  
• Regulate structural safety (against, e.g., tower tip-over or blade failure) through construction codes, combined with minimal setback requirements.  
• Regulate facility safety (e.g., preventing climbing towers, ensuring electrical safety, providing fencing around electrical gear). |
| Decommissioning                              | • Set clear requirements for what triggers and what constitutes decommissioning and restoration or reclamation.  
• Establish a decommissioning escrow fund, to ensure adequate resources will be available at the end of a project’s useful life or in the event the development fails. |
| Dispute resolution and mitigation            | • Establish procedures for dispute resolution and mitigation. |
The report ends with a **summary and conclusions**. This part reviews important literature on wind siting and zoning and asks: (1) Is there a middle ground that does not require compromises where everyone loses? and (2) Are there opportunities for improvement in wind-park siting and zoning procedures that are most likely to lead to a more rapid accumulation of the information and wisdom needed to guide future decisions?

Among researchers studying wind-park siting, there is at least some optimism regarding finding answers to these questions. For example: Wolsink (2007a) suggests that better solutions will be found through collaborative, community-based planning; Upham (2009) proposes that solutions might be found through focused attention on the field of environmental psychology; Sovacool (2009) advises attention to a broader research agenda about both social and technical aspects of decision making; and Sengers, Raven, & Van Venrooij (2010) recommend a concentrated study of news media and the potential role of news media in public education regarding decisions about our energy future. Any and all of these paths might prove advantageous.

For the time being, the most sensible recommendation is for communities to work together to make decisions about future energy systems development, not only wind energy development, in their local area. There are multiple paths to this goal, insofar as wind energy development is concerned. Some developers work extensively with host communities, prior to seeking siting and zoning approval, to create macro- and micro-siting plans that engender little, if any, public opposition. Some land owners form associations and hire their own developers, so that the owners can directly guide decisions about setback distances and micro-siting. Some governments simultaneously develop specific plans that identify both areas where wind parks will be excluded or should be avoided and also those areas where wind parks will be welcomed. Hindmarsh (2010, p. 560) holds that making good decisions about wind turbine siting requires “collaborative approaches,” including “the technical mapping of wind resources… [and] community qualifications and boundaries for wind farm location.” He argues that community-based decision making is likely to result in “improved problem framing and decision making concerning wind farm location, and thus development.” The goal, as Hindmarsh notes, is a process that will be perceived as legitimate and fair, and thus sustainable. Reaching that goal might be considered overly optimistic, but at least some communities have shown a willingness to give it a try. There is at least a good prospect that these approaches can reduce contentiousness and move towards consensus on how to guide wind-park siting and zoning.
Introduction

Wind-park siting and zoning present serious challenges. Modern utility-scale wind turbines are tall, rather imposing structures. Their construction often represents a significant change to what were previously open rural and agricultural landscapes. In many circumstances, modern wind turbine towers, which are roughly 25 stories tall, are by far the tallest structures being constructed in landscapes that have previously been rural and agricultural in character, containing no structures taller than silos.

Wind-park siting and zoning is frequently contentious, due to a variety of concerns regarding public acceptance and opposition. Already, wind siting and zoning cases have been heard in courts of appeals and supreme courts in multiple states.²

Often, officials with no previous expertise in wind energy systems have been tasked with developing the rules and regulations that ultimately guide wind power siting and zoning decisions, which then directly affect the planning, design, development, construction, and operations of wind parks.

It is axiomatic that all energy sources known today come with some unintended consequences, and perhaps also unanticipated consequences, and cause some negative side effects. Thus, the siting and zoning of any new energy facility is likely to raise concerns among potential neighbors. Local opposition groups form and try to influence siting and zoning for practically all new power plants, transmission lines, and substations. Thus, public officials who are charged with the task of recommending and making siting and zoning decisions often face competing, widely divergent views of the benefits and costs, pros and cons associated with new energy facilities. Wind generators and wind parks are a prominent example, perhaps the prominent example, of this local opposition phenomenon.

Is the ideal siting and zoning hearing one that has no controversy, where full consensus is reached on the part of all stakeholders? That goal can be impossible to achieve. The goal of the siting and zoning decision maker should be fact finding to support objective decision making, in keeping with the enabling siting and zoning laws and rules.

The purpose for this report is to provide guidelines about how best to manage the siting and zoning process and apply siting and zoning principles to wind-park decision making. Part II.A covers the siting and zoning process, and Part III covers recommendations about the specific criteria and principles used in making wind-park siting and zoning decisions. Applying best practices will enable policymakers to accelerate as much as practical the time requirements for siting and zoning procedures, while simultaneously helping to develop the full potential of wind energy and minimizing project risks.

This paper summarizes knowledge about the state of the art in wind-park³ and wind-turbine siting and zoning, to support decisionmakers’ efforts to develop and implement good siting and zoning practices. It draws on a survey of practices in all 50 states plus some U.S. territories and protectorates to explicate and report on current practices and principles. The survey results are presented in Appendix A.

² Wind siting and zoning cases have already appeared in state supreme courts in Kansas, New York, Texas, Vermont, Washington, and West Virginia, and in state appeals courts in California, Indiana, Maryland, Minnesota and Wisconsin (Google Scholar, Advanced Scholar Search for legal opinions, retrieved 7 Dec 2011; Minnesota Appeals Court, Cases Nos. A112228 and A112229, http://mncourts.state.mn.us/ctrack/publicLogin.jsp, retrieved 5 Jan 2012).
³ In this document, the term “wind park” is used to refer to installations of multiple utility-scale wind turbines. Frequently used synonyms are “wind development,” “wind farm,” or “wind project.” “Utility-scale” does not have any certain definition. For the purposes of this paper, “utility-scale” can be understood to mean wind generators that are typically about 1.5 megawatts (1,500 kilowatts) or larger, mounted on towers that average about 80 meters (roughly 250 feet) in height or taller.
As Ellenbogen et al. (Jan 2012, p. ES-8) explain,

Implicit in the term [“best practice”] is that the practice is based on the best information available at the time of its institution. A best practice may be refined as more information and studies become available.

Though this research has been informed by the survey of states, the goal was not to determine best practices simply by popularity. As much as possible: (a) best practices for procedures are determined by a review of literature about public decision-making processes, with particular focus on procedural justice and public participation; and (b) best practices for the criteria and principles involved are determined by a review of the literature about siting and zoning law and the best available information about the relationships between wind parks and siting and zoning.

The focus for this project is almost exclusively on utility-scale wind turbines and wind parks for siting and zoning on the land. A few of the state survey reports (California, Minnesota, New Hampshire, Oregon, and Wisconsin) include information specifically about siting and zoning for small wind turbines. Those states provide detailed information about siting and zoning standards and procedures exclusively for small wind. Off-shore wind energy development is not included in this study either, though it is a topic of interest in Atlantic, Gulf Coast, Pacific, and Great Lakes states.

Part I of this paper reports on the current status of wind siting and zoning, based on a survey of states and other jurisdictions and information gleaned from a review of published literature about wind siting and zoning. Part II reviews and identifies best practices for the procedures used in wind energy siting and zoning. Part III presents guidelines for addressing the specific criteria used to determine wind-park siting and zoning. That part of the report identifies the criteria commonly used and includes the best available information about applying those criteria to determine siting and zoning practices. That discussion is followed by a brief summary and conclusions.

4 “Small wind” does not have a certain definition. Generally, small wind systems are those that might be installed in a residential or commercial area to produce electricity for on-site use by a single residence, farm, or commercial facility. Typical small-scale wind generators produce less than a few hundred kilowatts, sometimes as few as one to ten kW, and they are mounted on towers no taller than about 150 feet. For more information see http://www.windpoweringamerica.gov/small_wind.asp, retrieved 7 Jan 2012.
I. Current Status

Taken as a whole, the experience with wind-park development has been quite positive. Given the large numbers of turbines installed and operating, and experience in some locations totaling 20 years and more, there have been relatively few complaints. As shown in Figure 1, 42,432 MW of wind generation had already been installed in the U.S. by late 2011.5

Figure 1: NREL Map of Currently Installed Wind Capacity by State

By September 2011, 14 U.S. states had more than 1,000 MW of installed wind capacity (California, Colorado, Iowa, Illinois, Indiana, Kansas, Minnesota, North Dakota, New York, Oklahoma, Oregon, Texas, Washington, and Wyoming). Survey data from these states is summarized in Table 1, with the states ranked installed capacity (as reported in Figure 1). Among the 14 states with over 1,000 MW of installed capacity, only Wyoming has neither a mandatory renewable portfolio standard nor a voluntary renewable portfolio standard.

5 Data sources used to generate Figure 1 focus almost exclusively on commercial, utility-scale wind generators. Small-scale (residential or small commercial) wind generators are typically not included. This map’s data for each state is copied into Table 1, Column 2.
renewable portfolio goal. Indiana, North Dakota, and Oklahoma have voluntary goals. The other ten states that are leaders in installed capacity have mandatory standards. Eleven of these 14 states have RPS policies that promote in-state facility development.

Another 14 states had between 100 and 1,000 MW (Arizona, Idaho, Maine, Maryland, Michigan, Missouri, Montana, Nebraska, New Mexico, Pennsylvania, South Dakota, Utah, Wisconsin, and West Virginia). Five states had between 20 and 100 MW (Hawaii, Massachusetts, New Hampshire, Ohio, and Tennessee). Five states had between one and 20 MW (Alaska, Delaware, New Jersey, Rhode Island, and Vermont). A dozen states, notably many in the Southeast, had no commercial wind development at the time (Alabama, Arkansas, Connecticut, District of Columbia, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, Nevada, South Carolina, and Virginia).

In many areas, wind parks have been developed with little controversy, resulting in few if any reported problems. Where problems have occurred, though, they have attracted significant news media and public attention, sometimes followed by litigation. In particular places, wind parks have been responsible for bird and bat kills that concern wildlife conservation agencies. In others, relatively small numbers of wind-park neighbors report persistent, acute, and chronic problems and concerns.

Because of the reported problems, in many jurisdictions siting and zoning hearings become a major focal point for opposition groups, who are intent on protecting themselves and their communities from what they believe is a land-use intrusion that will result in irreversible negative effects. Although typically relatively small numbers or percentages of the population come out against wind-park development, public opposition, when it does arise, tends to be vocal and intense. It is also common that citizens who generally favor wind-park development represent what could be called a “silent majority” of people who are less motivated to participate in siting and zoning hearings.

Wind energy siting and permitting practices in the U.S. are mainly influenced by three factors in each state: (1) preexisting siting and permitting practices for other kinds of energy facilities; (2) renewable-energy support policies, especially renewable portfolio standard (RPS) or broader clean energy standard (CES) policies; and (3) public acceptance.

State-level wind siting and zoning responsibility is more likely where preexisting policies have already vested energy facility siting responsibility with a state agency. In those circumstances, state authorities are most likely to be charged with weighing applications for wind parks larger than some particular, legislated minimum capacity.

State renewable-energy support policies have focused some attention on wind-park development, especially in the 37 states that have adopted policies setting either mandates or goals for increasing the use of renewable energy. Most U.S. states’ renewable energy support policies use quota systems that rely on auctions to select renewable energy projects to receive power purchase agreement (PPA) contracts for the sale of electricity. Those auctions tend to favor wind parks, because the price of energy from wind parks in locations with commercially viable wind resources is generally lower than that for other renewable energy options.

Also, many state renewable energy support policies favor in-state electricity generation, one way or another. These policies, especially those that focus on in-state renewable resources, have encouraged

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7 Various policies promote in-state renewable energy production and use. These are briefly summarized in Table 1. For details, see: Database of State Incentives for Renewables & Efficiency, http://www.dsireusa.org/rpsdata and http://www.dsireusa.org/incentives/index.cfm?SearchType=RPS&&EE=0&RE=1, retrieved 22 Dec 2011. See also the discussion about “tilt” policies in Grace, Donovan, and Melnick, 2011, especially pp. iii, 10-12.
wind prospectors to investigate opportunities in practically all of the windiest areas in the country, even areas with more potential siting and zoning obstacles.

Public acceptance, broadly speaking, depends on features of the landscapes where wind developments are proposed, such as housing density or the lack thereof, the perceived existence and importance of scenic beauty, and whether the areas are considered to be natural or already disturbed by human activity. The current status of public acceptance varies widely in different regions of the country and even in different jurisdictions within states. In states where local authorities have responsibility for wind-park siting and zoning, it is not at all unusual to find some townships or counties adopting ordinances intended to restrict or prevent development, while others are adopting development-friendly ordinances.

Unsurprisingly, wind-park developers have generally focused first on those areas with fewer obstacles to siting and zoning. The tendency is for wind parks to be built first in the windiest areas (where the economics are most favorable) and in landscapes with the fewest environmental and political obstacles to development. Barriers to development are varied, though, depending on factors such as population density and suburbanization, as well as concerns about potential negative effects on wildlife and special habitats. Barriers can also include cumbersome or uncertain and unpredictable state and local siting and zoning procedures and practices.

Part I.A of this report briefly summarizes state wind-park siting and zoning procedures and principles, based on information gleaned from the state survey data that is presented in Appendix A. Part I.B summarizes the nature of wind-park opposition, and lists the major concerns raised by opposition groups.

A. Summary information from the survey of state practices

This part of the report summarizes information gleaned from the survey of state wind energy siting and zoning practices and principles. The surveys were completed beginning in the summer of 2011. NRRI student interns and staff searched the Internet to find references about practices in each state. Once that data was compiled, preliminary surveys were circulated to in-state contacts deemed as most likely to be knowledgeable about the state’s practices. The in-state contacts were asked to review and help edit the survey data and the contacts were always invited to forward the survey data to others who were likely to be familiar with the state’s practices. Surveys are considered complete only after they have been reviewed and accepted as accurate by one or more in-state experts.8

The completed surveys are attached in Appendix A. Findings from the surveys are summarized in Table 1 (pages 6-10). The rest of Part I.A (pages 11-14) reports on the data presented in Table 1 and presents some additional summary information gathered from the survey reports. Table 2 (pages 11-12) shows a copy of the same data as Table 1, but only for those 14 states identified in Figure 1 as having more than 1,000 installed MW of wind capacity. In Table 2, the 14 states are ranked in descending order, based on installed wind capacity.

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8 Names of the individuals responsible for the original data collection and in state reviewers are shown at the end of each state’s survey record. As of this publication date, reviews are yet to be completed for 12 states. The authors intend to continue efforts to update the survey reports, as needed, to keep them up to date. The most current survey data will be published on the NRRI website, in the area devoted to wind energy information.
Table 1: Summary of State Wind Siting and Zoning Practices

<table>
<thead>
<tr>
<th>State</th>
<th>MW Installed</th>
<th>Primary Authority (Limit)</th>
<th>Primary (P) or Secondary (S) State Authority</th>
<th>State Energy Siting</th>
<th>Primary Rule</th>
<th>Evaluation Criteria</th>
<th>Voluntary Guidelines</th>
<th>Model Ordinance</th>
<th>Sound Standard</th>
<th>Setback Standard</th>
<th>Local Ordinances</th>
<th>RPS In-State</th>
<th>REZ</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alabama</td>
<td>0</td>
<td>State</td>
<td>CPCN from PSC (P)</td>
<td>Dillon’s</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
<td></td>
<td></td>
</tr>
<tr>
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1 See all table notes at the end of the table, on page 10. See Appendix A for more detailed information about each state’s practices.
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Table 1 (Continued): Summary of State Wind Siting and Zoning Practices

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<td>Dillon’s</td>
<td></td>
<td>Y</td>
<td></td>
<td></td>
<td>4</td>
<td>M</td>
<td>D</td>
<td>RGOS</td>
<td></td>
</tr>
<tr>
<td>Wyoming</td>
<td>1,412</td>
<td>State (≥30 turbines)</td>
<td>Permit from Industrial Siting Council (≥30 turbines) (P)</td>
<td>Dillon’s</td>
<td>Y</td>
<td></td>
<td></td>
<td>WREZ</td>
<td></td>
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</tbody>
</table>

Table 1 (Continued): Summary of State Wind Siting and Zoning Practices
### Table 1 (Continued): Summary of State Wind Siting and Zoning Practices

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</table>

Table Notes: See also the individual survey reports for each state, presented in alphabetical order by state name, in Appendix A.

1. Source data for Column 2 is Figure 1 (p. 3).
2. Column 3 indicates “Local” when the primary siting authority rests with the local (county or municipal) government or “State” when primary authority is with the state. Any “Limit” means that a wind-park size criterion (number of turbines in Wyoming, acres in Maine, or capacity – number of MW – in 14 states) determines jurisdiction. In those circumstances, wind parks larger than the expressed limit trigger state authority. “Both” applies to Iowa and New Jersey, where siting authority is held by both the state and local units of government.
3. Column 5: “Y” for yes indicates there is a state energy facility siting council or board separate from the state public utility commission.
5. Columns 7 and 8: “Y” means yes, the state does have mandatory evaluation criteria (Column 7) or voluntary guidelines (Column 8). A “W” in either column means primarily or exclusively for wildlife. States with both Y and W in either column means multiple documents exist, one focused explicitly on wildlife.
6. Columns 10 and 11: “Y” indicates that standards are included in evaluation criteria. “Model” means that criteria are included in a model ordinance.
9. Column 14: Many state RPS programs include provisions to promote in-state renewable energy facilities, such as wind parks. A recent NRRI Report (Grace, Donovan, & Melnick, 2011) calls this a “tilt” policy (intended to tilt the playing field towards certain technologies). In Column 14: “B” means a “bonus” credit for at least some in-state facilities; “D” means electricity must be delivered into the state (or “DR” means delivered into the region) in order to qualify; “L” means a maximum limit on energy from out-of-state facilities or conversely a minimum limit on energy from particular kinds of in-state resources; “M” means a mandate for in-state generators; “R” means a mandate for regional generators; “S” means qualifying facilities must be in the service territory of a utility providing retail service in the state; and “U” means a mandate for a utility serving the state to own or contract for the qualifying renewable energy. Source: Database of State Incentives for Renewables & Efficiency, 2011, [http://www.dsireusa.org/incentives/index.cfm?SearchType=RPS&EE=0&RE=1](http://www.dsireusa.org/incentives/index.cfm?SearchType=RPS&EE=0&RE=1), retrieved 5 Jan 2012.
10. Column 15: REZ means Renewable Energy Zone(s). Coding indicates “Y” if there is a specific state process for determining zones (in Texas, Colorado, Utah, Michigan, and Nevada). Other codes include: “WREZ” for the Western Renewable Energy Zones process for 5 states); “RGOS” for the Regional Generation Outlet Study process at the Midwestern Independent [Transmission] System Operator (MISO) for parts or all of 12 states; “GBS” for the Gorge Bi-State Renewable Energy Zone, which includes six counties near the Columbia River in both Oregon and Washington.
11. Wisconsin’s Model Ordinance applies only for small wind systems, <100kW in capacity.
12. Nebraska’s >80MW limit applies only if the planned capacity would cause the utility’s total renewable energy production to exceed the company’s goal.
13. Maine’s state authority applies if the proposed wind-park involves greater than 20 acres of land, or if the wind-park will be sited in an “unorganized” area.
Table 2: Summary of State Wind Siting and Zoning Practices
(Top Ten States, Ranked by 2011 Installed Commercial Wind Generating Capacity in MW)

<table>
<thead>
<tr>
<th>State</th>
<th>MW Installed</th>
<th>Primary Authority (Limit)</th>
<th>Primary (P) or Secondary (S) State Authority</th>
<th>State Energy Siting</th>
<th>Primary Rule</th>
<th>Evaluation Criteria</th>
<th>Voluntary Guidelines</th>
<th>Model Ordinance</th>
<th>Setback Standard</th>
<th>Sound Standard</th>
<th>Local Ordinances</th>
<th>RPS</th>
<th>RPS In-State “Tilt”</th>
<th>REZ</th>
</tr>
</thead>
<tbody>
<tr>
<td>Texas</td>
<td>10,135</td>
<td>Local</td>
<td>Projects must register with PUC (S)</td>
<td>Dillon’s</td>
<td>Model</td>
<td>Model</td>
<td>2</td>
<td>M</td>
<td>M</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>California</td>
<td>3,599</td>
<td>Local</td>
<td>California Environmental Quality Act (S)</td>
<td>Dillon’s</td>
<td>Y</td>
<td></td>
<td>6</td>
<td>M</td>
<td>L</td>
<td>Y</td>
<td>WREZ</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Iowa</td>
<td>3,675</td>
<td>Both (&gt;25MW)</td>
<td>Certification from Iowa Utilities Board (&gt;25MW)</td>
<td>Y</td>
<td>Home</td>
<td>Y</td>
<td>5</td>
<td>M</td>
<td>U</td>
<td>RGOS</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Minnesota</td>
<td>2,518</td>
<td>State (&gt;5MW)</td>
<td>Permit from PUC (&gt;5MW) (P)</td>
<td>Dillon’s</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>2</td>
<td>M</td>
<td>RGOS</td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>Illinois</td>
<td>2,436</td>
<td>Local</td>
<td>DNR (S)</td>
<td>Home</td>
<td></td>
<td></td>
<td>5</td>
<td>M</td>
<td>LR</td>
<td>RGOS</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Washington</td>
<td>2,356</td>
<td>State (&gt;350MW)</td>
<td>Site Certification Agreement from Energy Facility Site Evaluation Council (&gt;350MW) (P)</td>
<td>Y</td>
<td>Dillon’s</td>
<td>W</td>
<td></td>
<td>M</td>
<td>DR</td>
<td>GBS, WREZ</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Oregon</td>
<td>2,305</td>
<td>State (&gt;105MW)</td>
<td>Certification from Energy Facility Siting Council (&gt;105MW) (P)</td>
<td>Y</td>
<td>Home</td>
<td>Y</td>
<td></td>
<td>1</td>
<td>M</td>
<td>BR</td>
<td>GBS, WREZ</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Oklahoma</td>
<td>1,482</td>
<td>Local</td>
<td></td>
<td>Dillon’s</td>
<td></td>
<td></td>
<td>1</td>
<td>G</td>
<td></td>
<td></td>
<td></td>
<td></td>
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<td></td>
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<tr>
<td>North Dakota</td>
<td>1,424</td>
<td>State (&gt;0.5MW)</td>
<td>21 State Agencies notified (S)</td>
<td>Dillon’s</td>
<td>Y</td>
<td></td>
<td>3</td>
<td>G</td>
<td></td>
<td>RGOS</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Wyoming</td>
<td>1,412</td>
<td>State (±30 turbines)</td>
<td>Permit from Industrial Siting Council (±30 turbines) (P)</td>
<td>Y</td>
<td>Dillon’s</td>
<td>Y</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td>WREZ</td>
<td></td>
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</tr>
</tbody>
</table>

1 See all table notes at the end of Table 1, on page 10. See Appendix A for more detailed information about each state’s practices.
<table>
<thead>
<tr>
<th></th>
<th>State</th>
<th>MW Installed</th>
<th>Primary Authority (Limit)</th>
<th>Primary (P) or Secondary (S) State Authority</th>
<th>State Energy Siting</th>
<th>Primary Rule</th>
<th>Evaluation Criteria</th>
<th>Voluntary Guidelines</th>
<th>Model Ordinance</th>
<th>Setback Standard</th>
<th>Sound Standard</th>
<th>Local Ordinances</th>
<th>RPS</th>
<th>RPS In-State “Tilt”</th>
<th>REZ</th>
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</thead>
<tbody>
<tr>
<td>1</td>
<td>New York</td>
<td>1,349</td>
<td>Local</td>
<td>CPCN from PUC (&gt;80MW) (S)</td>
<td>Dillon’s</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Model</td>
<td>Model</td>
<td>1</td>
<td>M</td>
<td>L</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Indiana</td>
<td>1,339</td>
<td>Local</td>
<td>CON from URC (S)</td>
<td>Home</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>13</td>
<td>G</td>
<td>L</td>
<td>RGOS</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Colorado</td>
<td>1,299</td>
<td>Local</td>
<td>CPCN from PUC (&gt;2MW) (S), PUC consults with Division of Wildlife (S)</td>
<td>Dillon’s</td>
<td>Y</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>M</td>
<td>BL</td>
<td></td>
<td>Y, WREZ</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Kansas</td>
<td>1,074</td>
<td>Local</td>
<td></td>
<td>Dillon’s</td>
<td>YW</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>3</td>
<td>M</td>
<td>B</td>
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</tr>
</tbody>
</table>
1. Responsibility for siting and zoning and certificates of necessity: state, local, or both

The factors summarized here are entered in Table 1, columns 3, 4, and 5. Column 3 indicates whether the primary wind siting and zoning authority in the state rests with the local government, state government, or both. The primary decision-making authority resides with local governments in 26 states and state governments in 22 states. Florida and Iowa have shared local and state responsibility. Column 4 includes a “(P)” to indicate a state agency has primary siting authority. Many states have a clearly defined secondary authority, as indicated by “(S)” in column 4. Often the secondary authority is responsible for determining whether a proposed wind-park meets the standards necessary to be granted a certificate of public convenience and necessity, or the equivalent. Secondary authority is frequently not explicitly for siting or zoning, but approvals from a primary siting and zoning authority can be one criterion needed to obtain approval from a secondary authority. If there is a state agency responsible for energy facility siting other than the state’s public utility commission (PUC), column 5 includes a “Y.”

In six states plus the District of Columbia the PUC is responsible for siting and zoning utility-owned wind parks. The states include Kentucky, Minnesota, New Mexico (for facilities >300MW in capacity), North Dakota, Virginia (for facilities >100MW), and West Virginia.

Twenty-three states and the District of Columbia require a certificate from the PUC. This is typically called a “certificate of public convenience and necessity” (CPCN). It represents a determination by the PUC that the public good will be served by the construction and operation of a particular facility. CPCN hearings can include information about siting and zoning, and siting and zoning approval can be a prerequisite to a CPCN, but in many cases the CPCN approval is separate from siting and zoning approval. In those circumstances, a developer must obtain both siting and zoning approval from one agency and a CPCN from another. States requiring a CPCN from the PUC include: Alabama, Alaska, Arkansas, Colorado, Delaware, Hawai‘i, Indiana, Maryland, Minnesota, Mississippi, Nevada, New Mexico, New York, North Carolina, North Dakota, South Carolina, South Dakota, Texas, Utah, Vermont, Virginia, West Virginia, and Wisconsin. CPCN requirements are sometimes triggered only when a facility will be owned by a public utility, or when a facility is larger than some specific size (as indicated in Table 1, columns 3 and 4).

Eleven other states, indicated with a “Y” in column 5, have an energy facility siting authority that is separate from the PUC. These include: Connecticut, Florida, Maine, Massachusetts, Nebraska, New Hampshire, Ohio, Oregon, Rhode Island, Washington, and Wyoming. It is common for state energy facility siting to apply only to larger-capacity projects, but the limits triggering state authority range from as small as 1 MW in Connecticut and 5 MW in Ohio to as large as 300 MW in New Mexico and 350 MW in Washington. The limits are listed in columns 3 and 4. Commercial wind parks are most likely to be much larger than those smallest limits, but are often smaller than the largest limits.

No matter what criteria determine the dividing line between state and local authority, developers are prone to selecting the state or local government venue that they believe offers the greatest chance of siting and zoning success. Development plans for project size and location are quite likely to be adjusted to meet particular criteria. This issue has been addressed in a few states already, with policymakers reducing the project size limit that will trigger state review for wind projects (in Appendix A, see the History of siting authority reported for North Dakota and Ohio).

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9 Different states use different names for the state agency that is the public utility regulatory authority. The most common names used are “public service(s) commission” (PSC) and “public utility commission” (PUC), but several states use other names. In this paper, the generic term, PUC, is used to represent the relevant commission or board.
Whether or not it is stated explicitly in the state summaries in Appendix A, all relevant federal laws apply to wind siting and zoning decisions. Various federal agencies will have some authority, depending on the specific locations being considered. These include the following: Army Corps of Engineers (COE), Bureau of Land Management (BLM), Federal Aviation Administration (FAA), Federal Communications Commission (FCC), Environmental Protection Agency (USEPA), Fish and Wildlife Service (USFWS), and U.S. Military. In many circumstances, USEPA requirements are delegated to state (or sometimes local government) agencies. Illinois publishes this list of federal agency requirements, which is a good example for all the states:

1. Federal Aviation Administration (FAA): (a) Determination of No Hazard to Air Navigation; (b) Notice of proposed construction (form FAA 7460-1); (c) Lighting plan; (d) Post-construction form (form FAA 7460-2).


5. U.S. Environmental Protection Agency (USEPA): Spill Prevention, Control and Countermeasures Plan (SPCC Plan, 40 CFR112).


It is also common for state and county departments of transportation to have some oversight regarding wind-park construction, including plans for the delivery of components to the construction site, road use during construction, and the disposition of temporary roads after construction is completed.

2. A primary rule about local authority: Home Rule versus Dillon’s Rule

In Table 1, Column 6 differentiates states into one of two types, according to the primary rule that governs state versus local authority: Home Rule and Dillon’s Rule. The original difference would be found in the state constitution.

Home Rule states grant broad authority and autonomy to local governments. The essence of home rule is that local governments hold all authority that has not been ceded explicitly to the state or federal governments, through either the federal or state constitutions or by legislation. Alternatively, Dillon’s rule generally holds that all authority not explicitly residing in the federal government is held by the state government, unless explicitly delegated to local governments through the state constitution or through state legislation. Therefore, Dillon’s rule reinforces that some powers should be reserved by states in order to ensure equality for all.

In practice, though, Dillon’s rule and home rule are not mutually exclusive. Legislatures in some Dillon’s Rule states have explicitly authorized limited home rule for some local governments, usually counties but sometimes municipalities. Those states include Colorado, Illinois, Kansas, North Dakota, and Washington.10 A general expectation might be that Home Rule states would tend to have local authority and Dillon’s Rule states would tend to have state authority for wind siting and zoning. In practice, though,

Home Rule states are evenly split in terms of local versus state authority, but more Dillon’s Rule states (20 of 31) have already delegated wind siting and zoning authority to local units of government.

3. Mandatory evaluation criteria, voluntary guidelines, model ordinances, setback and sound standards, and local ordinances

Data on these factors is included in Table 1, Columns 7 through 12. As shown in Column 7, 27 of the 50 states have published lists of the criteria that are used to evaluate wind siting and zoning decisions. Washington’s criteria cover only wildlife protection concerns. For the other 23 states and District of Columbia, the survey did not discover any clear list of evaluation criteria.

Ten states have published voluntary guidelines for wind siting and zoning. Those states are indicated with a “Y” in Table 1, column 8, meaning general guidelines, a “W” meaning guidelines explicitly for addressing wildlife concerns, or both letters. The ten states include Arizona (explicitly for wildlife), Georgia, Kansas (including both a general guidelines and wildlife guidelines), Maryland (explicitly for wildlife), Michigan, New Mexico (explicitly for wildlife), New York (including both a general guidelines and wildlife guidelines), Rhode Island, South Dakota (including “natural and biological resources”), and Vermont. Table 3 indicates with a “Y” the major factors included in each state’s guidelines. Michigan is the only state with guidelines for all the identified topics, but some (e.g., mitigation) are bare mentions, with no details about how the guideline might be implemented.

Table 3: Factors Included in State Wind Siting and Zoning Guidelines

<table>
<thead>
<tr>
<th>State</th>
<th>Wildlife</th>
<th>Aesthetics</th>
<th>Birds</th>
<th>Bats</th>
<th>Noise</th>
<th>Setbacks</th>
<th>Mitigation</th>
<th>Decommissioning</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arizona</td>
<td>Y</td>
<td></td>
<td></td>
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<td></td>
<td></td>
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<tr>
<td>Georgia</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
<td>Y</td>
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<tr>
<td>Kansas</td>
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<td>Maryland</td>
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<td>Michigan</td>
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<td>New Mexico</td>
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<tr>
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<td>Y</td>
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<td>Rhode Island</td>
<td>Y</td>
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<td>Y</td>
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<td>South Dakota</td>
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<td></td>
<td></td>
<td></td>
<td>Y</td>
<td>Y</td>
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<tr>
<td>Vermont</td>
<td>Y</td>
<td>Y</td>
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</tbody>
</table>

Five states, labeled “Y” in Table 1, Column 9, have published model ordinances intended to guide local governments. They include Massachusetts, Minnesota, New York, Pennsylvania, Utah, and Virginia.

As shown in Table 1, columns 10 and 11, a handful of states have published setback standards, sound standards, or both. Both of these columns differentiate between mandatory standards, indicated “Y,” and recommended or advisory standards for local government consideration, indicated “Model.” As shown in Table 1, with the exceptions of Minnesota (mandatory sound standard only) and Wyoming (mandatory setback standard only), all of the other states identified in Table 1, columns 10 and 11, have either both mandatory or both model setback and sound criteria. Mandatory setback and sound standards are found in Delaware, Rhode Island, and Virginia. It is interesting to note that these are three states with little commercial wind energy activity. Model setback and sound standards exist for Georgia, Massachusetts, New York, Pennsylvania, Texas, and Utah.
Table 1, column 12, reports the number of local ordinances that have been discovered and included in a database being assembled by the National Renewable Energy Laboratory.

In addition to that information that is tabulated in Table 1, the survey reports in Appendix A identify two states that have published clear procedural steps for wind siting and zoning (Maine and North Dakota) and two that have published explicit standards for determining wind siting and zoning (Maine and Minnesota). The Maine and Minnesota standards are more than just lists of the criteria to be considered; they list both the criteria and how compliance with the criteria will be determined.

Also, six states report that efforts to better define wind siting and zoning practices are presently underway but incomplete. Connecticut is developing new regulations and presently prohibits acting on pending wind siting requests until the new regulations are adopted. Iowa and New York are developing new regulations based on each state’s respective June 2011 legislation. Maryland has drafted but not yet implemented new voluntary guidelines that will cover more than the existing guidelines for wildlife only. Rhode Island is updating its guidelines and reports it might develop a model ordinance as a part of that effort. Texas, which presently has none, is developing guidelines.

### 4. Supporting policies: clean energy portfolio standards and goals, promoting in-state wind energy facilities, and renewable energy zones

As shown in Table 1, Column 13, 29 states and the District of Columbia have renewable energy portfolio standard (RPS) mandates (M), and eight states have renewable energy goals (G).11

Column 14 summarizes how 29 of the 37 states with RPS mandates or goals have policies intended to promote the development of in-state renewable resources, including wind parks.12 Those policies are encoded with one, two, or three letter codes. In Column 14: “B” means a “bonus” credit for at least some in-state facilities; “D” means electricity must be delivered into the state (or “DR” means delivered into the region) in order to qualify as eligible to count for RPS compliance; “L” means a maximum limit on energy from out-of-state facilities or conversely a minimum limit (often called a “carve-out”) on energy from particular kinds of in-state resources; “M” means a mandate for in-state generators; “R” means a mandate for regional generators (usually, in the territory served by a regional transmission organization, RTO); “S” means qualifying facilities must be in the service territory of a utility providing retail service in the state; and “U” means a mandate for a utility serving the state to own or contract for the qualifying renewable energy.

Only two states, Connecticut and Michigan, explicitly require utilities to demonstrate that their renewable energy procurement plans conform with their approved integrated resource plan (IRP) or renewable energy plan.

Another policy that indirectly supports wind-park siting and zoning is the development of renewable energy zones. This is reported in Table 1, column 15. Typically, a renewable energy zone (REZ) is identified through a planning process that includes a general review of wind resources and broad-based, regional land-use compatibility with wind-park development, combined with electric transmission system planning.

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11 The distinctions between mandatory and voluntary RPSs are not always completely black and white. Many so-called mandatory programs include legislated circuit breakers or off ramps. See the details for each program at http://www.dsireusa.org/summarymaps/index.cfm?ee=1&RE=1, http://www.dsireusa.org/rpsdata/index.cfm, and http://www.dsireusa.org/summarytables/rrpre.cfm.

12 RPS tilt policies are not the only means that states use to promote in-state renewable energy facility development. In addition to specific RPS rules or standards, all states offer at least some financial incentives for renewable energy. See: Database of State Incentives for Renewables & Efficiency, 2011, Financial Incentives for Renewable Energy [web page], http://www.dsireusa.org/summarytables/finre.cfm, retrieved 5 Jan 2012; and Hempling, Stanton, and Porter, 2011.
modeling and planning. In most REZ processes, once specific zones are identified, transmission will be built to interconnect the zone to electricity loads, in anticipation that wind-park development will follow.

States with explicit state-level REZ processes include California, Colorado, Michigan, and Texas. These are indicated with a “Y” in column 15. Many other states and utilities are participating in REZ-like transmission modeling and planning under the auspices of regional transmission organizations. The Midwest Independent [Transmission] System Operator (MISO) Regional Generation Outlet Studies (RGOS) have included Indiana, Illinois, Iowa, Michigan, Minnesota, North Dakota, Ohio, South Dakota, and Wisconsin, plus the Canadian province of Manitoba (MISO, 2011). The Western Renewable Energy Zone (WREZ) initiative includes Arizona, California, Colorado, Idaho, Montana, Nevada, New Mexico, Oregon, Utah, Washington, and Wyoming, the part of Texas near El Paso, the Canadian provinces of Alberta and British Columbia, and a small portion of northern Mexico in Baja California (Western Governors Association, 2009). In addition, the Gorge Bi-State Renewable Energy Zone is an initiative for six counties near the Columbia River in both Oregon and Washington (www.ebrez.org). The U.S. Eastern Interconnection States’ Planning Council also includes a workgroup presently working on state energy zones modeling, for all of the states and Canadian provinces east of the Rocky Mountains (see http://communities.nrri.org/web/eispc/share-and-view-files-members/-/document_library/view/195538).

B. The nature of wind-park opposition and list of major concerns

But for public opposition, there would be little controversy about wind-park siting and zoning; technical best practices would determine siting and zoning decisions, and that would be that. Because of strongly held local concerns, though, public input frequently becomes an important or perhaps the most important factor in siting and zoning decisions. This is true for both macro- and micro-siting.13

It should be noted that when decisions are made by local siting and zoning authorities, the decisionmakers are most likely the neighbors of those who might be opposed. Those local decisionmakers are often elected officials, too, and there have already been experiences in some jurisdictions where voting for local officials turns on public sentiment about wind-park siting and zoning decisions. Therefore, the democratic process, with public input influencing the outcome, is of serious importance.

Wind-park siting opposition is sometimes characterized by pro-wind advocates and developers as a “not in my backyard” (NIMBY) attitude held by a small number of area residents who are most likely aggrieved because they are not going to benefit financially from land-lease payments. Although there can be a kernel of truth in this observation, academic researchers fault the NIMBY label for multiple reasons and find that anti-wind sentiments are more nuanced and complex (Devine-Wright, 2004, 2009; Devine-Wright & Howes, 2010; Eltham, Harrison, & Allen, 2008; Jegen & Audet, 2011; Jones & Eiser, 2009; Musall & Kuik, 2011; Hindmarsh, 2010; Mooney, 2010; and Wolsink, 2007a, 2007b).

Critiques of the NIMBY label are that it is overly simplistic and “pejorative” (Musall & Kuik, 2011, p. 3252). A precise definition of NIMBY “refer[s] to a situation in which someone has a positive attitude towards something in general but accompanies this with a motivation to oppose its installation locally, due to reasons of self-interest” (Wolsink, 2007, cited in Jones and Eiser, 2009, p. 4605). As Jones and Eiser (2011, p. 4605) explain, though,

Many researchers have found that when defined strictly in these terms, NIMBYism is relatively rare and certainly is too simplistic to be used as a sole explanation for all local opposition to

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13 Macro-siting means the general location of a wind park. A macro-site can be thought of as the boundary that defines the overall areas that are inside and outside an area considered for wind-park construction. Micro-siting involves the detailed decisions about the placement of each wind turbine, the required access roads, and the necessary interconnections to the transmission or distribution grid. Micro-siting depends on many factors, including prevailing winds, technical features of the selected wind turbines, and the precise locations of homes and other buildings, property lines, exclusion zones, and setbacks around avoidance zones.
proposed development [emphasis in original; references omitted]. … [A]n often incorrect and indiscriminate usage of the term has infused NIMBY with derogatory connotation and left it outdated and lacking explanatory value.

In the context of decisions about wind parks, such NIMBY self-interests most notably could include concerns about effects on property values, negative perceptions of visual impacts, and fears about noise and shadow flicker. Countervailing hypotheses about public opposition, however, identify a more complex “set of influential factors… [that] include [the] national political environment, local perception of economic impacts, social influences such as trust and institutional factors such as fairness and inclusiveness of the planning and execution of the project” (Musall & Kuik, 2011, p. 3253). In a public survey in Cardiff, Wales, Demski (2001, pp. 3-4) found that “opinions around wind farms were more complex and diverse compared to other technologies… [and] the majority of people… should not be classified as either strong supporters or strong resisters (of wind farms) and instead can be found somewhere in between these two positions.” As Pasqualetti (2000, p. 385) explains, all kinds of energy facility developments can “encounter public resistance, especially where land is sacred, protected, scenic, or otherwise sensitive.” In particular, he notes, siting a modern wind park changes the “out of sight, out of mind” relationship between people and energy production. Thus, researchers are finding that citizen concerns and opposition is guided by deep-seated issues involving competing land uses and attachment to place. These issues are most acute in circumstances where wind parks are proposed for areas with sufficient housing density that potential neighbors’ concerns are heightened by the prospect of fairly close proximity among wind turbines and houses. These concepts and the associated lessons for public engagement and consultation are briefly explored in Part II.E of this report and revisited in the Summary and Conclusions.

When engaging in siting and zoning procedures, anti-wind groups and individuals arm themselves with information obtained from anti-wind web sites. Examples include AWEO (www.aweo.org), Industrial Wind Action Group (www.windaction.org), and National Wind Watch (www.wind-watch.org).14

Ubiquitous internet access among local activists facilitates the dissemination of anti-wind documents and thereby tends to focus all local anti-wind groups on the same basic issues and concerns. Table 4 summarizes many of the objections raised by opposition groups. In Table 4, italic font denotes recommendations for the role that each set of objections ought to play in siting and zoning decisions. Some of the concerns are not directly relevant to siting and zoning procedures, but experience with groups opposed to all kinds of locally unwanted land uses (LULUs) demonstrates that opposition groups typically raise every possible objection (Cockerill, Groothuis, & Groothuis, 2011, p. 10).

14 Website home pages retrieved 12 Dec 2011.
### Table 4: Typology of Anti-Wind-Park Arguments

<table>
<thead>
<tr>
<th>Topics and Subtopics</th>
<th>Example of anti-wind characterization. Siting and Zoning Relevance.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Human Health, Nuisance, and Annoyance Factors</strong></td>
<td></td>
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<tr>
<td>Noise</td>
<td>“[W]ind farms produce a noise that’s hard to comprehend and even more dangerous to live close to. The beating of the blades have not only their own throbbing sounds, but beat harmonically together to create a cacophony of audible confusion…” (Brougher, 2008).</td>
</tr>
<tr>
<td>Infrasound</td>
<td>“[B]ased on our knowledge of the harmful effects of noise on children’s health and the growing body of evidence to suggest the potential harmful effects of industrial wind turbine noise, it is strongly urged that further studies be conducted…before forging ahead in siting industrial wind turbines.” (Bronzaft, 2011).</td>
</tr>
<tr>
<td>Shadow flicker</td>
<td>“Dizziness (specifically, vertigo) and anxiety are neurologically linked phenomena. Hence the anxiety and depression seen in association with other symptoms near wind installations are not a neurotic response to symptoms, but rather a neurologically linked response to the balance disturbances people experience from shadow flicker or low-frequency noise.... Based on these health effects and hazards, turbines should not be placed within 1700 feet of any road or dwelling. Those living within 1/2 mile (2640 ft) should be apprised that they are likely to experience very bothersome levels of noise and flicker, which continue (though to a lesser degree) to a mile or more from the turbines.” (Pierpont, 2005).</td>
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<tr>
<td></td>
<td><em>Wind parks should not be singled out for special noise criteria. Siting and zoning can apply noise criteria, but noise limits should apply equally to all sources. Separate consideration should be given to construction noise.</em></td>
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<tr>
<td></td>
<td><em>It is a simple matter to calculate the precise locations and maximum annual duration of shadow-flicker effects. A siting standard can limit shadow flicker.</em></td>
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<td></td>
<td><em>Both noise and shadow-flicker complaints can be amenable to mitigation, and an escrow account subject to independent management by an objective, disinterested arbitrator can be established for this purpose.</em></td>
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<tr>
<td></td>
<td><em>Neighbors should have the right to waive noise and shadow-flicker standards.</em></td>
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<tr>
<td><strong>Safety</strong></td>
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<tr>
<td>Ice-throw</td>
<td>“The bottom line is that ice, debris or anything breaking off the wind turbine blades (including the blades themselves) can impact a point almost 1,700 feet away from the base of the turbine” (Matilsky, 2011).</td>
</tr>
<tr>
<td>Blade failure</td>
<td>“Especially in the mountainous sites or in the northern areas icing may occur frequently and any exposed structure – also wind turbines – will be covered by ice under special meteorological conditions. This is also true if today's Multi Megawatt turbines with heights from ground to the top rotor blade tip of more than 150 m can easily reach lower clouds with supercooled rain in the cold season, causing icing if it hits the leading edge.” (Siefert, Westerhellweg, &amp; Kroning, 2003).</td>
</tr>
<tr>
<td>Tower failure</td>
<td>“[W]ind turbines are being whipsawed and hammered to pieces constantly, and the public is not being made aware of this real and present danger, for fear there will be a grass-roots uprising against it before they are saddled with [wind parks] and don’t have any more say-so in the matter.” (Brougher, 2008).</td>
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<td></td>
<td><em>Tower failure for utility-scale turbines is characterized by vertical collapse (like a beverage can crushing when stepped on), rather than tipping over from the base. Tower construction standards should guide setback distances, rather than the remote possibility of tower tip-over.</em></td>
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<td></td>
<td><em>Ice throw and blade failure resulting in parts hurtling through the air are increasingly rare. Modern turbines are continuously monitored in real time and will shut themselves down if ice accumulates on blades. Ice shedding is thus almost exclusively limited to the zone directly underneath the turbine.</em></td>
</tr>
<tr>
<td>Topics and Subtopics</td>
<td>Example of anti-wind characterization. Siting and Zoning Relevance.</td>
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<td>-------------------------------------------------------------------</td>
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<tr>
<td><strong>Safety (continued)</strong></td>
<td>Setback distances of 1.5 times turbine height (tower plus blade) should be considered maximal. Neighbors should have the right to waive setback distances from “participating” buildings and property lines. Wind-park owners (and insurers) should be liable for damages caused by ice throw, blade failure, and tower failure. An escrow account should cover potential liability and decommissioning costs.</td>
</tr>
<tr>
<td>Ice-throw Blade failure Tower failure</td>
<td></td>
</tr>
<tr>
<td><strong>Property Values</strong></td>
<td>“The days on market was more than double for those properties inside the windmill zones. The sold price was on average $48,000 lower inside the windmill zones than those outside. The number of homes not absorbed (not sold) was 11% vs. 3%.” (Luxemburger, n.d.).</td>
</tr>
<tr>
<td>Visual amenity Sense of place, of community Industrial appearance Tourism impacts</td>
<td></td>
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<tr>
<td>“There are people who can’t sell their homes and are forced to rent other living accommodation and people who sell their homes to the wind energy companies at much reduced prices and then are ‘gagged’ from talking about any of the negative health effects” (Chevalier, n.d.).</td>
<td></td>
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<tr>
<td>“The degradation these enormous sprawling industrial complexes bring to our cultural and visual resources is least understood. Our colleagues... describe West Texas today as an alien landscape where one can drive for miles and miles and miles (and miles) and see nothing but wind turbines. The nighttime experience is even more surreal with the blinking red lights.” (Industrial Wind Action Group, 2005).</td>
<td></td>
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<tr>
<td>An escrow account should cover potential liability and decommissioning costs.</td>
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<tr>
<td><strong>Wildlife and Natural Features</strong></td>
<td>“Where’d all the animals go? My guess is as far away from those things as they can get.” (Brougher, 2008).</td>
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<tr>
<td>Avian mortality (birds and bats) Habitat destruction, fragmentation</td>
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<tr>
<td>“Save the Eagles International wishes to warn the international community about the threat that windfarms and their power lines represent for biodiversity. Unlike cars, buildings, and domestic cats, wind turbine blades and high tension lines often kill protected or endangered birds like eagles, cranes, storks, etc. Cumulatively and over the long term, 3.5 million wind turbines to be installed worldwide will cause the extinction of many bird species, some of them emblematic.” (Duchamp, 2011).</td>
<td></td>
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<tr>
<td>Exclusion zones should be identified in concert with state and federal wildlife agencies based on the best available scientific information and pre- and post-construction monitoring. Mitigation measures should be identified and included in siting stipulations. Mitigation funds should be included in escrow accounts as necessary to ensure compliance.</td>
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<tr>
<td><strong>Energy Policy</strong></td>
<td>“The erratic nature of the wind means that turbines simply cannot supply the base load that other forms of generation do. Those other generators will continue to be needed to back up the wildly variable output of wind turbines, with the probability that in so doing these plants will actually emit more pollution for each kilowatt-hour they generate than if they were allowed to operate normally.” (Roberson, 2004).</td>
</tr>
<tr>
<td>Capacity factor Emissions effects Integration costs Reliability</td>
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<tr>
<td>“[S]ome reliable, dispatchable generating unit(s) must be immediately available at all times -- and operating at less than peak efficiency and capacity -- to &quot;back up&quot; the unreliable wind generation. The reliable, backup unit(s) must ramp up and down to balance the output from the wind turbines. … Wind turbines have virtually no ‘capacity value.’ Thus, electric customers pay twice: once for the wind energy and again for reliable capacity.” (Schleede, 2005).</td>
<td></td>
</tr>
<tr>
<td>Topics and Subtopics</td>
<td>Example of anti-wind characterization. <em>Siting and Zoning Relevance.</em></td>
</tr>
<tr>
<td>----------------------</td>
<td>---------------------------------------------------------------</td>
</tr>
</tbody>
</table>
| **Energy Policy** (continued)  
  Capacity factor  
  Emissions effects  
  Integration costs  
  Reliability  
  | “Peak power… during the hottest summer months… [is] far more demanding on the power grid, yet the wind power available in the winter months… is on average greater than in the summer. That’s a huge contradiction… Nor can we store wind power… So for the most part, winter winds and spring storms must either be wasted, or they will create surges which blow out the transformers, power equipment, and burn up their own generators, and set the grid back hundreds of millions of dollars, as has happened by wind surges in Oregon, and many times in Denmark, Germany, and other nations…” (Brougher, 2008).  
  “In high winds, ironically, the turbines must be stopped because they are easily damaged.” (Brougher, 2008).  
  “A nuclear plant is tens of times cheaper and thousands of times safer per [terawatt-hour] than gigantic air turbines will ever be – even if we learn someday how to prevent them from burning up, blowing the grid, and folding in half under a high wind load, and blending our birds with the landscape.” (Brougher, 2008).  
  The only relevance to siting and zoning might be for substations and transmission facilities, which also need approvals. None of these other issues are siting and zoning issues, per se. |
| **Economic Development**  
  Subsidies  
  Employment  
  | “Tax avoidance – not environmental and energy benefits – has become the prime motivation for building ‘wind farms.’ … ‘Wind farms’ produce few local economic benefits and such benefits are overwhelmed by the higher costs imposed on electric customers through their monthly bills. … When the expected contribution of wind energy toward supplying US energy requirements is taken into account, wind energy is among the most heavily subsidized of all energy sources.” (Schleede, 2005).  
  “[I]nvestment dollars going to "renewable" energy sources would otherwise be available… for other purposes that would produce greater economic benefits. ‘Wind farms’ have very high capital costs and relatively low operating costs compared to generating units using traditional energy sources. They also create far fewer jobs, particularly long-term jobs, and far fewer local economic benefits. ‘Wind farms’ are simply a poor choice if the goals are to create jobs, add local economic benefits, or hold down electric bills.” (Schleede, 2011).  
  “[B]illions of [federal grant] dollars… – all of it exempt from federal corporate income taxes – is being used to fatten the profits of some of the world’s biggest companies” (Bryce, 2011).  
  These are not relevant siting and zoning concerns. |
II. Best Practices for Wind Siting and Zoning Procedures

Table 5 briefly summarizes the best practices for wind siting and zoning procedures. The recommendations are influenced by practices in those states and several foreign countries where wind energy resources have been developed with what appears to be a minimum of regrets.

Of course to some extent, progress in wind energy development can reflect simply an abundance of wide-open spaces where turbines can be placed without affecting many citizens at all. As shown in Table 2, many of the states that are leading in installed wind energy capacity are in the Great Plains and West and have an abundance of rangeland and farmland, large land parcels, and sparse population density. Prominent examples include Iowa, North Dakota, Oklahoma, Texas, and Wyoming. On the other hand, there are several states that do have greater population density and more urban and suburban lands where wind development is also already substantial and growing. Prominent examples of those include Illinois, Indiana, Minnesota, and New York.

In any case, the recommendations presented here and in Part III reflect what has been gleaned from the survey of the states, a review of the literature, and the author’s experience and best judgment.

Table 5: Best Practices for Procedures

<table>
<thead>
<tr>
<th>Recommendation</th>
<th>Description</th>
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<tbody>
<tr>
<td>1. Develop procedures that result in clarity, predictability, and transparency</td>
<td>Jurisdictions with locations suitable for commercial wind development should anticipate interest and proceed to develop and publish siting and zoning procedures, principles, and guidelines.</td>
</tr>
<tr>
<td>2. Establish a one-stop, pre-submission consultation</td>
<td>Provide basic information for applicants in a single meeting, identifying and explaining the basics of all necessary permits and approvals.</td>
</tr>
<tr>
<td>3. Identify and map constrained and preferred wind energy development zones</td>
<td>Make available and accessible to the interested public GIS maps of exclusion, avoidance, and preferred development zones.</td>
</tr>
<tr>
<td>4. Include preferred development zones in transmission plans</td>
<td>Begin modeling and planning for wind power interconnections in preferred development zones as soon as the zones are identified.</td>
</tr>
<tr>
<td>5. Prepare and make available guidelines for participants</td>
<td>Explain procedures and timelines for when, where, and how to participate in public hearings. Provide information about decisions already completed through rulemaking.</td>
</tr>
<tr>
<td>6. Prepare and make available for local siting and zoning officials guidelines, checklists, and model ordinances</td>
<td>Support local government decision makers by providing the best available technical resources.</td>
</tr>
<tr>
<td>7. Ensure the sequence for obtaining permits and approvals meets requirements to allow development of suitable projects</td>
<td>The sequence of events leading to approval or rejection of an application should entail a logical progression through the planning and design stages, prior to siting and zoning approval that allows construction to begin.</td>
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</tbody>
</table>
A. Develop procedures that result in clarity, predictability, and transparency

All involved parties benefit from procedures that are clear and predictable and lead to transparency in decision making. Procedures need to be spelled out in ample detail so that all participants can understand how to participate, and when and where participation is expected. Applicants should understand their responsibilities. This all sounds obvious, but experience shows that in too many circumstances procedures are not spelled out. Applicants and other participants often find it difficult to learn what is expected, the sequence of events and venues, and time frames needed to progress through the siting and zoning process.

At the outset, a lack of clarity can be blamed on the novelty of siting and zoning for a wind park. However, all siting and zoning officials can quickly learn about the general attractiveness of their jurisdiction for commercial wind energy development. Wind resource maps are readily available that are accurate enough for making general determinations about good, better, and best areas for commercial development (Wind Powering America, 2011). Jurisdictions with locations suitable for commercial wind development should anticipate interest and proceed to develop and publish siting and zoning procedures, principles, and guidelines.

B. Establish one-stop, pre-submission consultation for applicants

A best practice for siting and zoning is to establish a one-stop procedure for applicants, in the form of a pre-submission consultation (Rosenberg, 2008, p. 681). This means applicants will have an opportunity to meet once, with one or more of the responsible agencies. The goal is for the applicant to come away from the one meeting with a clear understanding of all the necessary permits and approvals needed. One-stop procedures can be difficult when coordination involves multiple levels of government, but good communications can still work towards this goal. If nothing else, at least the organization with lead responsibility for wind-park siting and zoning can have available for applicants a list of all permits and approvals, which specifies the criteria that trigger each requirement. For each permit or approval, the one-stop agency should be able to communicate all the basic information about each requirement, including the contact persons, procedures, sequence of approvals required, timelines, and where and how to obtain complete, detailed information.

Delaware, Florida, and Oregon have provisions for one-stop meetings with applicants. Florida and Oregon both have state level siting (although Florida’s applies to other kinds of power plants, not wind parks). Delaware has primarily local siting and zoning for wind parks, but a one-stop state agency helps applicants understand all required permits.

C. Identify and map constrained and preferred wind energy development zones

Siting and zoning authorities should identify and communicate about constrained and preferred development zones; in preferred areas development would be encouraged, and in constrained areas, the opposite. Information about these zones should be available in geographic information system (GIS) format. Examples of constrained zones include areas already identified as important to the life-cycle of endangered species, areas of particular historical or archeological importance, and wetlands, and can take two forms: exclusion zones and avoidance zones. Exclusion zones are known to be off limits, and avoidance zones are places where development deserves extra caution. Many government agencies that have what is effectively veto power over siting and zoning already have maps in GIS format, showing areas that are either exclusion or avoidance zones. Basic mapping information should be available, identifying constrained zones and the relevant buffers around the constraints (Great Lakes Wind Collaborative, 2011, Best Practice #11).

Such maps will not be a complete substitute for ground-truth assessments of specific locations, but they can go a long way towards helping all parties to avoid wasting time and resources on the evaluation of locations that will ultimately prove to be unavailable for development. Where jurisdictions have made
determinations about setback (i.e., buffer) distances, those can also be clearly communicated. All interested parties should be able to use the available maps to understand both macro- and micro-siting. As Rosenberg (2008, p. 681) explains, such maps serve to “highlight actual and potential conflicts between wind power projects and listed sensitive lands.” “Hopefully,” he notes, “projects could be planned to avoid these areas and if [wind power projects] were proposed for sites in the vicinity of such areas, potential adverse impacts could be mitigated through careful project planning.”

Preliminary examples of this type of mapping capability are available from the Great Lakes Wind Collaborative (GLWC, http://erie.glin.net/wind/, retrieved 9 Jan 2012) and Vermont Energy Atlas (www.vtenergyatlas.org, retrieved 20 Jan 2012). The GLWC GIS system for eight states and two Canadian provinces assembles many different GIS map layers already available from various sources. It demonstrates a system that can facilitate identifying areas of concern. The Vermont atlas system does not yet include information about constrained zones, but it does demonstrate excellent ease of use and presents much practical information.

Similarly, if state or local jurisdictions have identified preferred development zones, information about those areas can be made available in map form. For example, several states are engaged in identifying renewable energy zones to receive special treatment for transmission expansion (see Table 1, Column 15). Also, some states have identified renewable energy resource development as a priority use for brownfield redevelopment (for example, New Jersey Statute § 40:55D-66.11, 31 Mar 2009, Wind and solar facilities permitted in industrial zones, www.dsireusa.org/documents/Incentives/NJ17R.htm). Colorado enabling legislation encourages county master plans to consider both “methods for assuring access to appropriate conditions for solar, wind, or other alternative energy sources… [and avoiding] areas containing endangered or threatened species” (Colorado Revised Statutes 30-28-106(3)(a)(VI)–(XI), www.michie.com/colorado). Similarly, Denmark directs its county governments to identify wind development zones (Danish Energy Agency, 2009, pp. 12-14).

Procedures for identifying areas for preferred development should ensure meaningful public participation and input, but once preferred development areas are selected, then information about those zones should be readily available to help guide developers.

D. Include preferred development zones in transmission plans

As discussed above, mapping preferred (and constrained) zones is recommended. With preferred zones, the mapping should, ideally, go one step further. Depending on the estimated wind power production from preferred development zones, the areas should be linked to and coordinated with transmission development plans (see Great Lakes Wind Collaborative, 2011, Best Practices #4 and #5). If the estimated production in a preferred development zone is substantial, wind parks will need to be interconnected to the electric transmission, rather than distribution, system. The determination of what capacity level is too big for the local distribution system needs to be done on a case-by-case basis: It depends on the design and operation of the existing distribution and transmission systems, and on nearby loads and generation.

Whatever interconnections will be required, whether to the distribution or transmission system or both, modeling and planning for interconnections in the preferred development zones should begin as soon as the zones are identified. The reason is that the entire process for transmission planning, design, and construction – including the transmission siting and zoning process – will often take much more time than the process for planning, designing, obtaining approvals, and constructing a wind park. As shown in Table 1, Column 15, 23 states are already engaged in procedures to identify wind energy resource zones, with those procedures linked to transmission planning. That includes 9 of the top 10, 16 of the top 20, and 21 of the top 30 states, in terms of wind capacity development.
E. Prepare and make readily available guidelines for participants

All participants need clearly understandable guidelines, so they can know ahead of time when to expect public hearings, what will be the substance of those hearings, and how to participate. Many participants will not be frequent participants in planning and zoning hearings. It certainly helps if they learn what is expected.

As shown in Table 4, wind-park opponents frequently raise issues that are not germane to siting and zoning hearings. It is best for everyone concerned if clear, complete information is provided, prior to public hearings, to explain which venues will be addressing which subjects. Where guidance or regulations exist, those should be made clear. For example, California legislation establishes restrictions for tower height, parcel size, setbacks, and noise level, and prescribes practices for public notice of applications and hearings (Assembly Bill 45 of 2009; see Database of State Incentives for Renewables & Efficiency, California – County Wind Ordinance Standards, retrieved 22 Dec 2011 from www.dsireusa.org/incentives/incentive.cfm?Incentive_Code=CA61R&re=1&ee=1).

Maine has spelled out the sequence of procedures that apply to wind siting and zoning but does not include the expected timelines.

Ohio mandates public information meetings prior to “filing an application to build a new facility.” These are not formal public hearings, which take place after an application is filed. The purpose for a public information meeting is “to inform stakeholders about plans to file an application… [and] as an opportunity to gather public input and hear the public’s concerns, which the company considers in developing its application.” (Ohio Power Siting Board, 2010, http://www.puco.ohio.gov/emplibrary/files/OPSB/Presentations_Manuals/OPSBbrochure2010.pdf).

There is no conclusive evidence that educational meetings will reduce public concerns or opposition. On the other hand, there is reason to believe that public opposition increases and festers if people feel, rightly or wrongly, that procedures do not provide adequate opportunities for public concerns to be aired and addressed. (See, for example, English, pp. 307-08, and Huber & Horbaty, 2010, pp. 50-51.) In fact, there is extensive literature about public engagement and participation in all kinds of land use and technology decisions, and explicitly about wind parks (see, for example: Agterbosch, Meertens, & Vermeulen, 2009; Hindmarsh, 2010; Koebel, 2011; Jones & Eiser, 2009; Mazur, 2007; Sovacool, 2009; Toke, Breukers, & Wolsink, 2008; and Wilson & Grubler, 2011).

F. Prepare and make available for local siting and zoning officials guidelines, checklists, technical resources, and model ordinances

States should consider providing technical documents to help support local government decision makers. This is important for states that have a shared or exclusive local government responsibility for wind siting and zoning, and wherever state rules do not supersede or at least constrain local authority.

It is important to recognize that local authorities might not be familiar with wind siting and zoning. It is certainly not likely that any particular local authority will come to their job with a background in wind siting and zoning. As with many issues facing local governments, specialized education is often needed to arm local governments with the tools necessary to guide decisionmaking.

As Rosenberg (2008, pp. 674-75) notes, there is a concern that “[l]ocal zoning decisions can be little more than project ‘popularity contests’ driven by the prevalent popular sentiment.” And, he points out, the generally rural local governments that are most likely to receive proposals “often have limited resources” and can be lacking the “extensive planning resources or personnel… to evaluate wind power siting proposals.” Therefore, Rosenberg (2008, pp. 675-76) prescribes “an attitude of ‘shared responsibility’” between state and local governments. He recommends “provid[ing] local governments, planners and
citizens with expert state-level guidance… .” This approach can include “voluntary guidelines, checklists, and technical resources… to aid [local governments] in their evaluation of siting wind projects.”

As shown in Table 1, columns 7 through 11 report on the kinds of information discussed here. Twenty-seven states have published evaluation criteria that support wind siting and zoning. Those are frequently environmental protection criteria, though, rather than explicit wind siting and zoning criteria, and apply to all construction projects. Ten states have published voluntary guidelines for wind parks, but three of those are exclusively guidelines for wildlife and habitat protection. Ten states have model ordinances and six states have model standards for setback and sound. Although many states have one or more of these documents available, only Georgia, Michigan, and New York have provided both voluntary guidelines and model ordinances. Only three states (Delaware, Rhode Island, and Virginia) have published mandatory rules about both setback and sound. Minnesota has a sound standard and Wyoming has a setback standard.

G. Ensure that the sequence for obtaining permits and approvals meets requirements to allow development of suitable projects

Procedures should allow for suitable projects to obtain all required approvals. The sequence of events leading to approval or rejection of an application should entail a logical progression through the planning and design stages, prior to siting and zoning approval that allows construction to begin.

For example, at least one state agency requires a project application to include certification that the project complies with all applicable land-use ordinances and a copy of a final interconnection agreement. At least some developers might hesitate to spend as much as sometimes can be required to obtain a final interconnection agreement, unless and until they are certain the project is approved.

Also, power purchase agreements (PPAs) could require developers to demonstrate that a project has the requisite control over the property planned for development (that is, land leases), siting and zoning approval, sufficient progress towards obtaining an interconnection agreement, and the financial wherewithal to complete construction and enter into commercial operation in a reasonable time period. If those are requirements for the sale of wind-generated electricity, then the siting and zoning approval cannot be contingent upon obtaining the PPA.
III. Guidelines for Implementing Wind-Park Siting and Zoning Criteria and Setback Distances

This part of the report reviews the many criteria that are addressed in wind-park siting and zoning, and provides guidelines based on the best available information about each criterion. As already mentioned (see p. 2), best practices are subject to refinement over time, as more knowledge is gained and as wind generator technologies change and improve. Table 6 summarizes the recommendations included in Part III.

Table 6: Wind-Park Siting and Zoning Criteria, Recommended Approaches and Setback Distances

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Recommended approach</th>
</tr>
</thead>
<tbody>
<tr>
<td>Noise, sound, and infrasound</td>
<td>• Noise standards should allow some flexibility.</td>
</tr>
<tr>
<td></td>
<td>• Noise standards should vary depending on the area’s existing and expected land uses, taking into account the noise sensitivity of different areas (e.g., agricultural, commercial, industrial, residential).</td>
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<tr>
<td></td>
<td>• Determine pre-construction compliance using turbine manufacturer’s data and best available sound modeling practices.</td>
</tr>
<tr>
<td></td>
<td>• Apply a planning guideline of 40 dBA as an ideal design goal and 45 dBA as an appropriate regulatory limit (following Hessler’s proposed approach, 2011).</td>
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<tr>
<td></td>
<td>• Allow participating land owners to waive noise limits.</td>
</tr>
<tr>
<td></td>
<td>• Establish required procedures for complaint handling.</td>
</tr>
<tr>
<td></td>
<td>• Identify circumstances that will trigger, and techniques to be used for:</td>
</tr>
<tr>
<td></td>
<td>(a) mandatory sound monitoring; (b) arbitration; and (c) mitigation.</td>
</tr>
<tr>
<td></td>
<td>• Do not regulate setback distance; regulate sound.</td>
</tr>
<tr>
<td>Shadow flicker</td>
<td>• Restrict to not more than 30 hours per year or 30 minutes per day at occupied buildings.</td>
</tr>
<tr>
<td></td>
<td>• Allow participating land owners to waive shadow-flicker limits.</td>
</tr>
<tr>
<td></td>
<td>• Allow the use of operational practices and mitigation options for compliance.</td>
</tr>
<tr>
<td></td>
<td>• Do not regulate setback distance; regulate the duration of shadow flicker.</td>
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<tr>
<td>Ice throw</td>
<td>• Authorize demonstrated ice control measures.</td>
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<tr>
<td></td>
<td>• Require wind park to provide insurance and escrow funds to ensure compensation for proven damages resulting from ice throw.</td>
</tr>
<tr>
<td></td>
<td>• Do not regulate setback distance; regulate ice throw.</td>
</tr>
<tr>
<td>Wildlife and habitat exclusion zones</td>
<td>• Responsible wildlife protection agencies should use the best available scientific knowledge and data to determine exclusion and avoidance zones and appropriate buffers (that is, setback distances) beyond those zones.</td>
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<tr>
<td></td>
<td>• Permits should specify required pre-, during-, and post-construction monitoring.</td>
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<tr>
<td></td>
<td>• Permits should specify how mitigation requirements will be determined and what mitigation techniques will be considered.</td>
</tr>
<tr>
<td></td>
<td>• Regulate setback distances as required by responsible wildlife protection agencies and do not authorize siting in exclusion and buffer zones.</td>
</tr>
<tr>
<td>Aesthetic requirements</td>
<td>• Require neutral paint color and minimal signage.</td>
</tr>
<tr>
<td></td>
<td>• Require the minimum of nighttime lighting necessary to achieve FAA compliance.</td>
</tr>
<tr>
<td></td>
<td>• Require that realistic visual impact assessments, accessible to the public, be included in wind park planning and applications.</td>
</tr>
<tr>
<td></td>
<td>• Manage visual impact through setbacks and exclusions from critical competing land uses.</td>
</tr>
</tbody>
</table>
### Table 6 (Continued): Wind Park Siting and Zoning Criteria, Recommended Approaches and Setback Distances

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Recommended approach</th>
</tr>
</thead>
</table>
|**Critical competing land uses**| • Map as excluded zones any special cultural, anthropological, “sacred” lands, and highly valued scenic vistas.  
• Apply reasonable setbacks from non-participating property lines, occupied buildings, scenic vistas, and transportation and utility rights of way.  
• Allow participating properties to at least partially waive setback requirements from property lines and occupied buildings, in writing.|
|**Permit requirements for met towers, construction, and facility safety**| • Predetermine requirements and simplify procedures for approving meteorological (met) towers.  
• Regulate heavy construction requirements the same as any other heavy construction project, using the regulatory permitting system (e.g., for stormwater, surface water, transportation, noise, and wetlands permits).  
• Check for all required approvals for potential interference with radio and TV reception or radar. Provide for testing and mitigation of radio and TV interference problems that do occur.  
• Regulate structural safety (against, e.g., tower tip-over or blade failure) through construction codes, combined with minimal setback requirements.  
• Regulate facility safety (e.g., preventing climbing towers, ensuring electrical safety, providing fencing around electrical gear).|
|**Decommissioning**| • Set clear requirements for what triggers and what constitutes decommissioning and restoration or reclamation.  
• Establish a decommissioning escrow fund, to ensure adequate resources will be available at the end of a project’s useful life or in the event the development fails.|
|**Dispute resolution and mitigation**| • Establish procedures for dispute resolution and mitigation.|

### A. Avoiding or mitigating public health and safety, nuisance and annoyance issues

Ellenbogen et al. (Jan 2012, p. ES-5) report, based on their independent review of the best available literature, that a “self-reported ‘annoyance’ response appears to be a function of some combination of the sound itself, the sight of the turbine, and attitude towards the wind turbine project.”

The Ellenbogen et al. study (Jan 2012, p. ES-7) concludes:

> There is no evidence for a set of health effects, from exposure to wind turbines that could be characterized as a “Wind Turbine Syndrome.” … [T]he weight of the evidence suggests no association between noise from wind turbines and measures of psychological distress or mental health problems. … None of the limited epidemiological evidence reviewed suggests an association between noise from wind turbines and pain and stiffness, diabetes, high blood pressure, tinnitus, hearing impairment, cardiovascular disease, and headache/migraine.

But the same researchers (Jan 2012, p. ES-11) recommend “an ongoing program of monitoring and evaluating the sound produced by wind turbines… [including] more comprehensive assessment of wind turbine noise in populated areas.” “Such assessments,” they report, “would be useful for refining siting guidelines and for developing best practices…”
In any case, some people really do get upset by the idea of, or the actual fact of, wind turbines being built nearby. As opponents in a siting and zoning process, they have a tendency to raise every argument they can think of to help dissuade officials from approving projects. (See Table 4).

The following materials address the significant concerns that are raised about public health, safety, nuisance, and annoyance issues. Not included in this list are electromagnetic field (EMF) effects and stray voltage. Those subjects should be regulated by other agencies, typically the PUC, and are not germane to siting and zoning decisions.

Some research suggests that wind-park opponents are affected by a “nocebo” effect, which is essentially the opposite of a placebo effect (see the Skeptic’s Dictionary, http://skepdic.com/nocebo.html, retrieved 27 Dec 2011). One widely cited study (Pedersen, Bouma, Bakker, & van den Berg, 2008) finds evidence of a nocebo reaction, among neighbors with no financial interest and an anti-wind-park predisposition. Ellenbogen et al. (Jan 2012, p. ES-8) state somewhat the reverse of this assessment. They find:

Effective public participation in and direct benefits from wind energy projects (such as receiving electricity from the neighboring wind turbines) have been shown to result in less annoyance in general and better public acceptance overall.

The next few sections of this report: (1) address noise, sound, and infrasound; (2) shadow flicker; (3) ice throw; and (4) pre- and post-construction monitoring of noise, sound, and infrasound.

1. Noise, sound, and infrasound

As can be inferred from dictionary definitions: (a) “noise” means sound that humans perceive as generally loud, unpleasant, unexpected, or undesired; “noise” means sounds that are disturbing; (b) “sound” means simply the sensations that can be perceived by the sense of hearing; and (c) “infrasound” means “a wave phenomenon of the same physical nature as sound but with the frequencies below the range of human hearing” (Merriam-Webster Dictionary, retrieved 24 Jan 2012 from http://www.m-w.com/dictionary/).

Sound pressure is measured in decibels (dB), using a device called a sound level meter. Decibels are measured using either an “A-weighted” scale (dBA, sometimes written “dB(A)”) or “C-weighted” scale (dBC, or “dB(C)”). The A-weighted scale is intended to measure the sounds as they are subjectively perceived by the human ear. The C-weighted scale is highly sensitive to low-frequency sound and is therefore normally used to evaluate sources where the low-frequency content of the sound is prominent or dominant. The C-weighted scale was developed to assess sound levels more commonly associated with occupational exposures. Environmental noise limits are commonly expressed solely in terms of A-weighted decibels.

Ellenbogen et al. (Jan 2012, p. ES-6) reviewed the best available reports on noise, sound, and infrasound. They conclude:

[I]t is possible that noise from some wind turbines can cause sleep disruption. … A very loud wind turbine could cause disrupted sleep, particularly in vulnerable populations, at a certain distance, while a very quiet wind turbine would not likely disrupt even the lightest of sleepers at that same distance. But there is not enough evidence to provide particular sound-pressure thresholds at which wind turbines cause sleep disruption. Further study would provide these levels. … Claims that infrasound from wind turbines directly impacts the vestibular system have not been demonstrated scientifically. Available evidence shows that the infrasound levels near wind turbines cannot impact the vestibular system.

Hessler (2011, pp. 11-12) reports:
[A]ny noise limit on a new project must try to strike a balance that reasonably protects the public from exposure to a legitimate noise nuisance while not completely standing in the way of economic development and project viability. It is important to realize that regulatory limits for other power generation and industrial facilities never seek or demand inaudibility but rather they endeavor to limit noise from the source to a reasonably acceptable level either in terms of an absolute limit (commonly 45 dBA at night) or a relative increase over the pre-existing environmental sound level (typically 5 dBA). … [T]he rate of adverse reaction comes down to a handful of individuals or very roughly about 4 to 6% when residences are exposed to project sound levels in the 40 to 45 dBA range. … [T]he vast majority of residents living within or close to a wind farm have no substantial objections to project noise, particularly if the mean sound level is below 40 dBA. …While the possibility of annoyance, if not serious disturbance, can almost never be completely ruled out, it appears that the total number of complaints would be fairly small as long as the mean project level does not exceed 40 dBA.

The inconsistency in reactions to wind turbine and wind-park noise makes it difficult to establish any absolute criteria that siting and zoning officials could use in all circumstances. Hessler (2011, p. 21) explains:

[T]he exact reaction to any project can never be predicted with certainty because project noise is often audible to some extent, at least intermittently, far from the project. However, the studies of response to wind turbine noise… suggest that the threshold between a mild or acceptable impact and a fairly significant adverse reaction is a gray area centered at 40 dBA.

However, observations of neighbors’ reactions to newly operational wind farms suggest that it is not necessary to rigidly impose a maximum noise level of 40 dBA in order to avoid complaints. Hessler (2011, p. 12) recommends 40 dBA as an ideal design goal, if it can reasonably be achieved, but 45 dBA as an appropriate regulatory limit. Adverse reactions to wind turbine noise between 40 and 45 dBA are still quite low, at roughly 2 percent of wind-park neighbors, even in rural environments with low background levels.

As with siting and zoning for other activities, the social good produced from the activity needs to be weighed against any local disturbances, including annoyances and nuisances. As with the siting and zoning of any other legal activity, the appearance of complaints, even more so the potential for complaints, is not reason enough for denial. From a legal standpoint, the preponderance of available evidence leads to the conclusion that noise requirements for wind turbines should be the same as those applied to any other legal activity that could be sited or zoned in the same jurisdiction.

Noise standards should also allow some flexibility because of the highly variable nature of both background noise and wind turbine noise. No single incursion beyond the noise standard should force abandonment of a wind park. The wide variability in wind turbine sound propagation makes it impractical to require absolute compliance with this kind of limit. Hessler (2011, pp. 35-63) provides detailed guidance for post-construction testing procedures.

The noise standard should allow micro-siting and construction based on the best available data on noise generated by the turbines planned for installation and modeling of the local conditions. It is also important to allow participating property owners to waive noise limits, in writing.

In approving wind-park construction, the siting and zoning permit should establish clear procedures to be invoked if there are complaints about noise. The wind-park owners and operators should have the opportunity to mitigate any confirmed problems, using any combination of operational and technical changes. For example, Leung & Yang (2012, p. 1037) identify opportunities to “significantly” reduce wind turbine noise “by putting obstacles in the [sound] propagation path.” These researchers also report a promising experiment where an “optimized… or serrated blade” noticeably reduced wind turbine noise.
As Ellenbogen et al. (2012, p. ES-11) propose, “If noise control measures are to be considered, the wind turbine manufacturer must be able to demonstrate that such control is possible.”

Ellenbogen et al. (2012, p. ES-11) also recommend “an ongoing program of monitoring and evaluating the sound produced by wind turbines… [including] more comprehensive assessment of wind turbine noise in populated areas…” They elaborate:

These assessments should be done with reference to the broader ongoing research in wind turbine noise production and its effects, which is taking place internationally. Such assessments would be useful for refining siting guidelines and for developing best practices.

North Dakota Department of Transportation (NDDOT, 2011, pp. 1, 6-7), as the state’s policy for “implementation of the requirements of the Federal Highway Administration (FWHA) Noise Standard at 23 Code of Federal Regulations (CFR) Part 772,” identifies and categorizes lists of specific, “noise sensitive land uses.” These cover everything from areas where “serenity and quiet are of extraordinary significance and serve an important public need” to “cemeteries, day-care centers, hospitals, libraries…” to areas where noise is expected and land uses are presumed to be “not sensitive to highway traffic noise” such as “agriculture, airports, … industrial, logging, … manufacturing, [and] mining…” Similar guidelines could be produced for wind parks, or perhaps the guidelines for transportation projects could be adapted for application to wind-park siting and zoning.

2. Shadow flicker

Shadow flicker is defined as “alternating changes in light intensity that can occur at times when the rotating blades of wind turbines cast moving shadows on the ground or on structures” (Priestley, 2011, p. 2). The International Energy Agency (2010, p. 42) identifies shadow flicker as a nuisance.

The existence of shadow flicker depends on turbine micro-siting, with respect to the distance from the turbine and compass direction between the turbine and any surfaces of concern. Wind-park designers can model where shadows might fall on each day of the year (see, for example, Zephyr North, 2009).

Shadow flicker will affect any particular location only during either sunrise or sunset. The specific location is a function of the potential alignment between the sun, a wind turbine, and a receiving surface. Given the geometry of the potential alignment, and then depending on the latitude and tilt of the earth on its axis, the effect can happen for only a small number of days per year as the point in the horizon where sunrise or sunset appears changes, moving north or south by a small compass angle each day. Plus, on those several days and during the times when shadows could occur, the sky needs to be clear enough for the effect to be noticeable.

In their study, Ellenbogen et al. (2012, p. ES-7–8) determine:

Scientific evidence suggests that shadow flicker does not pose a risk for eliciting seizures as a result of photic stimulation. … There is limited scientific evidence of an association between annoyance from prolonged shadow flicker (exceeding 30 minutes per day) and potential transitory cognitive and physical health effects.

Shadow flicker should be determined as a pre-construction activity. Reports can be provided so that the possible shadow effects on properties, buildings, and roadways can be understood. A reasonable standard can rely on micro-siting modeling to ensure that shadow flicker will not exceed 30 hours per year or 30 minutes per day at any occupied building. These are the most commonly used guidelines (Lampeter, 2011, pp. 5-14). However, the standard should also allow for property owners to waive the shadow-flicker maximum and for mitigation options, which could include changes in landscaping or window treatments to minimize concerns. It is even conceivable that a contract between a wind-park operator and property owner would provide for shadow-flicker limits through operational control, simply curtailing a particular
turbine during those times when shadow flicker would otherwise constitute a nuisance in excess of the local standard or some other agreed limit.

3. **Ice throw**

Ellenbogen et al. (2012, p. ES-8) report:

In most cases, ice falls within a distance from the turbine equal to the tower height, and in any case, very seldom does the distance exceed twice the total height of the turbine (tower height plus blade length). … There is sufficient evidence that falling ice is physically harmful and measures should be taken to ensure that the public is not likely to encounter such ice.

These researchers (Ellenbogen et al. 2012, p. ES-12) also advise that any ice-control measures used to comply with permit requirements should be demonstrated by the wind turbine manufacturer. Modern wind turbines that are planned for installation in climates where icing can be expected will have both physical characteristics and operational controls designed to minimize any concern about ice throw. Turbines are designed to stop rotating if ice builds up on blades, and some designs include blade heaters to shed ice. For siting and zoning purposes, it should be sufficient to review the plans for managing operations to minimize ice throw, and to require the wind-park owners to maintain liability insurance against the unlikely event that ice throw causes any damage or injury. Explicit setback requirements for ice throw should not be necessary.

4. **Pre- and post-construction monitoring**

   **for public health and safety, nuisance, and annoyance issues**

Since noise is one of the most common concerns for wind-park development, both pre- and post-construction monitoring should be considered for at least some facilities. Together, developers, communities, and siting and zoning authorities can determine which areas deserve special attention for pre-construction monitoring. Post-construction monitoring could be established only as a requirement for addressing noise complaints.

Hessler (2011, p. 25) proposes the pre-construction background-sound testing protocol:

[A] long-term, continuous monitoring approach is needed in which multiple instruments are set up at key locations and programmed to run day and night for a period of about two weeks or more. In essence, it is necessary to cast a wide net in order to capture sound levels during a variety of wind and atmospheric conditions and provide sufficient data so that the relationship between background noise and wind speed can be quantitatively evaluated. … [I]t is highly preferable to conduct this type of survey during cool season, or wintertime, conditions to eliminate or at least minimize possible contaminating noise from summertime insects, frogs and birds. In addition, it is best for deciduous trees to be leafless at sites where they are present in quantity to avoid elevated sound levels that might not be representative of the minimum annual level. Human activity, such as from farm machinery or lawn care, is also normally lower during the winter. While summertime surveys can be successful they should, as a general rule, be avoided wherever possible because nocturnal insect noise, for instance, can easily contaminate the data and make it impossible to quantify the relationship between sound levels and wind speed.

As already mentioned, Hessler (2011, pp. 35-63) provides detailed guidance for post-construction testing procedures.

All interested parties should recognize the potential role of post-construction monitoring for at least some wind parks, to produce the information necessary to inform best practices. But it is not necessary for every wind park to be monitored. Modeling and testing are reliable enough to deduce the likely noise effects from studies of similar turbines, wind conditions, terrain, and setback distances.
B. Preventing harm to flora, fauna, and habitats

Operating wind turbines in particular locations can harm ecosystems. Of special concern has been the killing of birds and bats. Thus, siting and zoning standards typically include provisions designed to protect wildlife and wildlife habitat.

The role in siting and zoning is to require the appropriate reviews before approval is granted and before construction begins. Specific wildlife and habitat concerns will require some locations to be excluded from development. Examples include habitats known to be used by threatened or endangered species or migratory birds, and wetlands. Such exclusions or related restrictions are governed by federal and state environmental protection laws and regulatory agencies. Siting and zoning authorities should also require applicants to demonstrate compliance with and approvals granted by the relevant environmental regulatory agencies, before a siting and zoning application is considered complete.

Wildlife and environmental studies are routine but critically important components of due diligence for wind-park planning. Developers know these studies are integral to obtaining the approvals that will allow construction and operation, and lenders check the studies prior to approving wind-park financing. The last thing a developer wants is to find out, post construction, that there are problems that threaten long-term operations. In fact, a developer wants to find out about such problems as early as possible, before dedicating resources to prospecting and planning for an area that can later prove to be undevelopable.

The wind industry has taken many steps to understand wind and wildlife interactions and has already changed tower and turbine designs, operating practices, and macro- and micro-siting to avoid, prevent, or mitigate problems. The American Wind Wildlife Institute (AWWI) was formed in 2008-09, as a forum for wind developers and manufacturers to work with environmental and wildlife preservation organizations and experts “to provid[e] and shar[e] scientific information and tools to advance wind energy with respect for the environment” (www.awwi.org/about/ and www.awwi.org/about/founders.aspx [web pages], retrieved 7 Jan 2012). The National Renewable Energy Laboratory (n.d.) also maintains an on-line database of literature about wind and wildlife impacts.

Efforts to understand the nature and extent of interactions between wind turbines, wind parks, and wildlife and habitat are continuing (see Wind Powering America, 2011b). But, as Ewert, Cole, & Grman (2011, p.1) report, “much remains unknown” and there are interactions that are presently “inadequately understood.” Thus, wildlife and environmental experts recommend a precautionary approach, combined with pre- and post- construction monitoring efforts, to provide the best available information that can be used to establish guidelines and perhaps translate to regulatory determinations. The U.S. Department of Interior, Fish and Wildlife Service is presently developing guidelines (www.fws.gov/windenergy and www.fws.gov/habitatconservation/wind.html [web pages], retrieved 7 Jan 2012).

These concerns are best managed by a combination of three practices: (1) identifying exclusion and avoidance zones based on the best currently available information about endangered and protected species and critical habitat; (2) requiring wildlife and habitat pre- and post-construction monitoring; and (3) mitigation requirements for circumstances where disturbance of important habitats cannot be avoided.

1. Wildlife and habitat exclusion zones

Exclusion and avoidance zones for wildlife and habitat should be determined by the state’s responsible wildlife protection agency. As already mentioned, to the extent practical those zones should be identified and mapped ahead of time. In addition to any areas pre-identified, wind energy developers should consult with the appropriate wildlife protection agencies to determine whether areas targeted for development include any environmentally or culturally sensitive areas that should be avoided or buffered.
It is not important for the maps to publicly specify why each area has been identified. Exclusion and avoidance zones can be identified for a wide variety of reasons, including for example “environmental, cultural, and historic sites, which may include wildlife refuges, feeding areas of protected species, and sensitive federal, state, and private lands” (Michigan Wind Energy Resource Zone Board, 2009, p. 75). It is sufficient just to identify zones being excluded and indicate they are sensitive.

2. **Wildlife and habitat pre- and post-construction monitoring**

When a wildlife protection agency determines that wind-park construction will encroach on or border sensitive areas, the agency should have the ability to require pre-construction monitoring and reporting. Depending on the results of pre-construction monitoring, the agency should consider its ability to enforce any conditions on construction and operation. Among reasonable conditions, depending on the concerns identified, can be monitoring and reporting during and after construction.

For example, Kansas Department of Wildlife and Parks Wind Power Position Statement (quoted in [www.fishwildlife.org/files/Kansas.pdf](http://www.fishwildlife.org/files/Kansas.pdf), retrieved 11 Nov 2011) declares:

> To support the study of and establishment of standards for adequate inventory of plant and animal communities before wind development sites are selected, during construction, and after development is completed. The resultant improvement in available knowledge of wind power and wildlife interactions obtained through research and monitoring should be used to periodically update guidelines regarding the siting of wind power facilities.

3. **Mitigation and operating practices to minimize negative impacts**


> When it is impossible to avoid significant ecological damage in the siting of a wind power facility, mitigation for habitat loss should be considered. Appropriate actions may include ecological restoration, long-term management agreements, and conservation easements to enhance or protect sites with similar or higher ecological quality to that of the developed site.

Davis, Weis, Halsey, & Patrick (2009, p. 9) advise:

> For wind projects, as with any land development, the reality is that not all impacts can be avoided. Even with full efforts at avoidance and minimization, impacts often remain including bird and bat mortality and habitat loss and fragmentation. For this reason, it is essential to understand and evaluate impacts as well as assess the need for offsets and compensatory mitigation.

Parameters for these practices are determined by the relevant wildlife protection, environmental, and natural resources authorities, and will depend on the species impacted and the potential or actual problems identified. If problems are identified after construction, then it is appropriate to consider operational changes.

For example, some operational techniques presently being tested show promise for identifying the presence of birds or bats, or even the insects that birds or bats might feed on, thus allowing operators to control wind turbines to reduce bird or bat injuries and fatalities (see: Davis, Weis, Halsey, & Patrick, 2009; Deign, 2011; and Leung & Yang, 2012).
C. Aesthetics

Siting and zoning authorities frequently include aesthetic requirements in wind-park permits. These include factors such as the appearance of the turbines themselves, nighttime lighting, and other requirements to limit visual impact. From a siting and zoning standpoint, these requirements are not very different from those authorities impose on all kinds of decisions about signage, lighting, and setbacks for commercial properties.

An apparent consensus on best practices has been achieved on paint color and nighttime lighting. Although there could be continuing progress on both issues, the gist of the consensus is that paint colors should be neutral, so that the turbines blend into the landscape to a significant extent. FAA (Patterson, 2009, p. 9) has determined that towers painted white do not need any daytime strobe lighting to warn pilots. It is most common for permits to limit any signage or advertising. For example, Delaware (Chapter 80, Title 29, § 8060, http://delcode.delaware.gov/sessionlaws/ga145/chp147.shtml) requires:

Wind systems shall be free from signage, advertising, flags, streamers, any decorative items or any item not related to the operation of the wind turbine. Electric wiring for the turbines shall be placed underground for non-building integrated systems.

Nighttime lighting can be minimized as much as practical while still meeting FAA requirements. Patterson (2009) explains the FAA requirements and how the FAA has worked to adjust its requirements for wind turbine lighting. Since nighttime lighting can be a nuisance for neighbors and an attractant for birds, bats, and the insects birds and bats might feed on, there has been interest on the part of wind turbine manufacturers, wind park developers, and the FAA to find the best means available to reduce negative impacts while keeping sufficient lighting to alert pilots of areas to avoid. The basic results are to limit turbine lights to the machines on the perimeter of a wind park and allow spacing of up to one-half mile between lighted turbines. Since 2009, in some circumstances and on a case-by-case basis, the FAA has even been able to approve a new obstacle collision avoidance system (OCAS) that reduces the need for lighting even further (Patterson, 2009, p. 13; PRNewswire, 2009).

Although many people might think of nighttime lighting as a minor issue, the FAA’s responsiveness is a positive example of the way the wind energy industry and government regulators can work together to reduce negative impacts. As Patterson (2009, pp. 1-3) reports, FAA’s goal has been “to make obstructions visible to airborne aircraft, while being as sensitive as possible to the surrounding environment.” He reports that the FAA worked cooperatively with DOE to “[d]etermine the most effective and efficient technique for obstruction lighting of wind turbine farms… focused on Aviation Safety, with consideration for wildlife, surrounding communities, and industry... consistent [and] easy to implement.”

Molnarova et al. (2012) surveyed residents in Central Bohemia, Czech Republic and reviewed 18 earlier studies to better understand public attitudes towards the visual impacts of wind turbines. They identify special concerns for “landscapes of high aesthetic quality.” But they also note, similar to findings from other research on public responses to wind turbines, “The most important characteristic of the respondents that influenced their evaluation was their attitude to wind power” (Molnarova et al., 2012, p. 269). Their conclusion is that their survey research “provides a further argument for considerate planning of renewable energy… and for the use of public participation, factors known to improve public attitudes toward wind power” (Molnarova et al., 2012, p. 277, footnotes omitted).

State guidelines often include provisions designed to ensure that realistic visual impact assessments, accessible to the public, will be included in wind park planning and applications. Examples include Kansas guidelines (Kansas Energy Council, 2005, pp. 7-8) and those of Maine, New York, Vermont, and West Virginia (Vissering, Sinclair, & Margolis, 2011, p. 6). Completing visual impact assessments and making them accessible to the public should be considered a best practice. The required level of detail can be adjustable, though, to reflect the particular landscape, population density, and proximity to especially
valued scenic vistas. To some extent, the retention of high-concern scenic vistas will be managed by exclusion zones and setback criteria (discussed in Part III.D, which follows).

D. Critical competing land uses and setback distances

As previously mentioned, some areas should be excluded from consideration for wind turbine placement. Some important land uses could be so difficult or even impossible to maintain in close proximity to wind turbines or wind parks, that they should be considered off-limits. As already discussed, primary examples include important anthropological and cultural resources, significant wildlife habitats and natural resource areas, and areas with preexisting land uses that are especially noise-sensitive. Mapping such areas and making that data available to developers and the public is recommended (in Part II.C).

To some degree, impacts on residential property values can serve as a proxy for the determination of the appropriateness of a wind-parks siting, because perceived adverse impacts will likely emerge in proximate home sales prices. Wind-park opponents have claimed and frequently predict that home property values have been and will be negatively affected in the area of wind parks. Therefore, they sometimes argue, any areas near homes deserve to be excluded from wind-park development.15

Analyzing the possible effects of wind-park proximity on home values has been difficult due to the relatively small number of transactions near the turbines (e.g., within one mile). The most thorough available studies, however (see, e.g., Hoen, Wiser, Cappers, Thayer, & Sethi, 2011, which collected 125 transactions within one mile of existing turbines), have found no evidence of an impact on selling prices due to proximity to turbines in the period after wind-parks have been constructed and begin operation. That notwithstanding, there is some emerging evidence that the period after announcement but prior to operation might coincide with significant impacts to proximate property values (see, for example: Eltham, Harrison, & Allen, 2008, p. 29; Hinman, 2010; Hoen, Wiser, Cappers, Thayer, & Sethi, 2011, pp. 280-81; Koebel, 2011, p. 9). During this period, risks to proximate property values are highest because actual impacts are difficult to ascertain, and, therefore, to the degree that home buyers and sellers take a risk-averse stance, impacts might be present.

Moreover, as with other large industrial installations, public fears can be exacerbated by perceptions of secrecy in development plans. In an effort to reduce those fears and decrease the perceived risks, a number of steps can be taken in the development process. Those include open and transparent public planning and decision-making processes that include serious attention to public sentiments and concerns, effectively engaging all interested parties in collaborative, community-based planning, and expanded efforts to accurately explain the changes to the community due to the wind-park (see Part II.E).

Setbacks from turbines for homes and property lines are a corollary to the property value impact discussion. In part because of the nascent state of research on property value impacts, reaching consensus on setback distances has been difficult across the U.S. This has been exasperated by the myriad different land uses surrounding U.S wind parks. That notwithstanding, guidelines or mandatory requirements from a handful of states do converge on 1 to 1.5 times the turbine height (that is, tower plus blade length, or more accurately tower plus rotor and blade radius) from, for example, property lines belonging to non-participating land-owners, roads, power lines, and other rights-of-way. It is also not unusual for states to require further setbacks from residences. Examples include Delaware, Massachusetts, New York, Pennsylvania, Utah and Wyoming (see survey data for these states in Appendix A).

Pennsylvania’s Model Ordinance recommends setbacks of 1.1 times turbine height from the nearest

15 In many areas of the country in the recent past, it could have been difficult for casual observers to isolate the possible effects of wind-park proximity because of the pervasive backdrop of major declines in home values resulting from the so-called mortgage crisis: There could have been real, observable declines in housing values that had nothing to do with wind-park proximity.
occupied building, but adds,

For non-participating landowners, “Wind Turbines shall be set back from the nearest Occupied Building located on a Non-participating Landowner’s property a distance of not less than five (5) times the Hub Height.”

Wyoming’s law (*Article 5 – Wind Energy Facilities, Statute 18-5-504*) requires:

- A turbine must be sited at least 110% of its height from any property line “contiguous or adjacent” to the proposed facility, unless the property owner waives the setback distance, in writing.
- A turbine must be sited at least 110% of its height from public roads.
- A turbine must be 550% of its height and no less than 1000 feet away from “platted subdivisions.”
- A turbine must be 550% of its height and no less than 1000 feet away from a residential dwelling.
- A turbine must be at least half a mile from city limits.

Two versions of setback criteria are reported as being common in Nova Scotia and Ontario, one for “on-site” and one for “off-site” (that is, for participating and non-participating) residences (Watson, Betts, & Rapaport, 2011, p. 2).

As previously mentioned, appropriate wind siting and zoning requirements, exclusion zones, and avoidance areas should depend on many factors. Setback distances tend to be used by siting and zoning authorities as an administratively simple means of addressing many concerns, including, for example, noise, shadow flicker, ice throw, wildlife and habitat, and aesthetic requirements.

Setback distances are also used to address two additional concerns, tower collapse or tip-over and blade failure. Both of these are rare occurrences, at least with respect to modern utility scale wind machines, and present evidence suggests that setbacks roughly equivalent to or modestly in excess of the turbine height offer sufficient protection against such risks. As with all other kinds of buildings and towers, to some extent construction codes and standards protect the public, which makes setback provisions for these purposes somewhat redundant.

Regulating setback distances is more convenient, in many ways, compared to directly handling the underlying issues through explicit decisions on a category by category basis. One virtue of setback distances is that once they are set they are easy to measure. But wind-park opponents frequently seek excessive setback distances, which they expect will prevent developers from trying to build a project in the area. If setback distances are based on arbitrary criteria, though, they are not likely to stand up to the scrutiny of a court challenge. It is better to establish minimal setback distances based on the few criteria where setback does appear to be justified, such as ice throw, and regulate all other determinations of distances by regulating the specific concerns as mentioned earlier, such as sound, shadow flicker, exclusion and avoidance zones for wildlife and habitat, and exclusion and avoidance zones for critical competing land uses. Given all of those restrictions, developers should be encouraged to work with host communities to establish a plan for macro- and micro-siting that will respect community desires and reduce the likelihood of post-construction problems.

**E. Permit requirements for met towers, construction, and decommissioning**

Siting and zoning authorities are also asked to approve requests to install temporary meteorological (met) towers. It is also common and appropriate for wind-park permits to be conditioned on meeting specific terms and conditions for construction and decommissioning.
For temporary met towers, jurisdictions with commercial-quality wind resources should predetermine the requirements and simply procedures for obtaining approvals. Criteria might include, for example, the maximum height for temporary met towers, a reasonable maximum duration (such as two years for data collection, plus reasonable set-up and take-down time), setbacks of at least tip-over distance from non-waived property lines and occupied buildings, and provisions for removal or replacement after initial data collection.

For construction, developers should enter into binding agreements with the appropriate authorities, ensuring that they will meet all requirements for minimizing negative impacts during construction. That is the same as for any other major construction project, with terms covering, for example, natural resource protection (e.g., wetlands, surface and storm water), noise, dust, and traffic.

Provisions for future site decommissioning and the restoration or reclamation of the land should also be included in permit requirements, and the decommissioning plan should be adopted as a binding contract between the developer and the relevant government authorities. The plan should describe what circumstances will trigger decommissioning, and the plan should be secured by an appropriate financial instrument (e.g., performance bonds, letters of credit or other corporate guarantees).

Rosenberg (2008, p. 684) relates:

Of particular importance in the permitting process is the closure or decommissioning phase of the project's life cycle. At the conclusion of their useful life, wind power facilities must be disassembled and the site restored to its pre-construction conditions or other conditions specified in the permit. Wind project applicants must provide financial assurance to the state that these steps are properly funded... Having this financial assurance will prevent the unfortunate situation of localities having abandoned facilities in their midst without available resources to carry out proper decommissioning.

F. Dispute resolution and mitigation

Finally, in the interest of clarity, predictability, and transparency, a wind-park siting and zoning permit should include provisions for dispute resolution and mitigation. This is no different from any other major contract, which includes fair and foreseeable provisions for complaint or dispute resolution. It is helpful for all concerned to understand their responsibilities and the procedures to be followed in the event that disputes arise.
Summary and Conclusions

The beginning of this report observes that wind-park developers have a propensity to focus their efforts first on those areas with ample wind resources and few barriers to siting and zoning. The reverse is also true; developers will avoid areas with uneconomical or marginal wind resources and where siting and zoning barriers are difficult to overcome.

Prospective wind-park neighbors who are opposed to development are likely to cheer siting and zoning ordinances that have the effect of blocking construction in their environs. But siting and zoning authorities should recognize their responsibilities both to create ordinances that meet all legal requirements, and to consider how the costs and benefits of siting decisions will affect everyone in their jurisdiction, not only those who are most vocal. And, as Ellenbogen et al. (2012, pp. ES-11–12) observe,

> The considerations should take into account trade-offs between environmental and health impacts of different energy sources, national and state goals for energy independence, potential extent of impacts, etc.

Of course there are some areas that should be excluded and reasonable setback distances should be maintained for a variety of land use types, including occupied buildings, roadways, utility rights of way, and special wildlife habitats. Leung & Yang (2012, p. 1032) report:

> Though wind power has performed well in recent years, it also creates a strong environmental impact, such as noise, visual and climatic impact. Although these impacts seem minor when compared with fossil fuels, its effect on humans should not be overlooked, due to its potential great development in usage. It is necessary to figure these potential drawbacks out, especially their potential long-term effects, and to find solutions to them in order to retain the long-term sustainability of wind energy.

Rosenberg (2008, p. 665) acknowledges:

> Although there are many advantages to wind power, disadvantages exist as well. Every energy-producing technology contains pros and cons which must be evaluated by government policymakers, the public and private investors. With regard to wind energy, some of the associated adverse effects or disadvantages are inherent in the nature of wind power itself while others relate to the use of this technology at particular sites. In the end, judgments must be made balancing and comparing the positive features with the negative ones.

Rosenberg (2008, p. 669) also points out:

> As research and experience with wind power technology become increasingly available, it is possible to separate verifiable claims of harm from those without basis in fact.

The associated hope is that increased experience, and the wisdom derived from it, will help guide future siting and zoning decisions. In the meantime, however, siting and zoning authorities, government energy policy decision makers at every level, and competitive markets that help shape energy supply and demand all have roles to play in making decisions based on the best available information.

In any case, the energy policy issues of concern to wind energy proponents also deserve some consideration in siting and zoning decisions. Those issues include, for example: diversifying energy supply; reducing reliance on fossil fuels; conserving water; and reducing or eliminating air pollutants and greenhouse gas emissions. Some weight should also be given to the prospective economic benefits for rural landowners and rural areas and from wind energy manufacturing, construction, operations and maintenance (Rosenberg, 2008, pp. 659-665).
The precautionary principle can be a useful guide to decision makers, but wind energy opponents propose siting and zoning precautions based on one set of concerns, while proponents propose another set. Sunstein (2005, p. 93) observes:

Much of the time… what is available and salient to some is not available and salient to all. For example, many of those who endorse the Precautionary Principle focus on cases in which the government failed to regulate some environmental harm, demanding irrefutable proof, with the consequence being widespread illness and death. To such people, the available incidents require strong precautions in the face of uncertainty. But many other people, skeptical of the Precautionary Principle, focus on cases in which the government overreacted to weak science, causing large expenditures for little gain in terms of health or safety. To such people, the available incidents justify a measure of restraint in the face of uncertainty. Which cases will be available and to whom?

As Sunstein explains, applying the precautionary principle requires decisionmakers to consider “margins of safety” and both the probability and magnitude of harm that might result from their decisions. Sunstein (2005, pp. 117-118) reasons:

Let us suppose, too, that we will learn… over time. If so, we might elect to take certain steps now, on the basis of a principle of “Act, then learn.” The steps we now take would not be the same as those that we would take if the worst outcomes were more probable, but they should be designed so as to permit us to protect against the worst outcomes if we eventually learn that they are actually likely. On this view, an understanding of what we do not know means not that regulators should do little, but that they should act in stages over time, adopting precautions that amount to a kind of insurance against the chance that the harm will be higher than we currently project in light of our current knowledge of both probability and magnitude. (footnote omitted).

Everyone needs to recognize that each wind energy macro- and micro-siting decision has fairly long-term ramifications. Once a turbine location is pinpointed, that decision has the effect of preventing another turbine from being placed any closer than a few rotor diameters away. Specific distances between turbines in a wind park will be determined based on exclusion and avoidance zones, siting and zoning setback requirements, and data regarding prevailing winds and technical aspects of the particular turbine and its blades. This does mean that siting decisions will have long-lasting effects in the landscape.

By the same token, everyone also needs to realize that wind turbine technology and operating practices continue to improve, so that the potential negative impacts and concerns raised by future machines could be fewer and smaller than those of today. This implies, at least to some extent, that there could be multiple paths to mitigation for decisions made today that result in significant concerns or complaints. Future mitigation could include, for example, replacing various important wind turbine components (such as blades, gearboxes, controls), or even whole turbines, with machines that are some combination of more reliable, quieter, and safer.

The important questions decisionmakers and policymakers can ask are: (1) Is there a middle ground that does not require compromises where everyone loses? and (2) Are there opportunities for improvement in wind-park siting and zoning procedures that are most likely to lead to a more rapid accumulation of the information and wisdom needed to guide future decisions?

Among researchers studying wind-park siting, there is at least some optimism regarding finding answers to these questions. For example: Wolsink (2007a) suggests that better solutions will be found through collaborative, community-based planning; Upham (2009) proposes that solutions might be found through focused attention on the field of environmental psychology; Sovacool (2009) advises attention to a broader research agenda about both social and technical aspects of decision making; and Sengers, Raven, & Van Venrooij (2010) recommend a concentrated study of news media and the potential role of news
media in public education regarding decisions about our energy future. Any and all of these paths might prove advantageous.

For the time being, the most sensible recommendation is for communities to work together to make decisions about future energy systems development, not only wind energy development, in their own local area. There are multiple paths to this goal, insofar as wind energy development is concerned. Some developers work extensively with host communities, prior to seeking siting and zoning approval, to create macro- and micro-siting plans that engender little, if any, public opposition. Some land owners associate and hire their own developers, so that the owners can directly guide decisions about setback distances and micro-siting. Some governments simultaneously develop specific plans that identify both areas where wind parks will be excluded or should be avoided, and also those areas where wind parks will be welcomed. Hindmarsh (2010, p. 560) holds that making good decisions about wind turbine siting requires “collaborative approaches,” including “the technical mapping of wind resources… [and identifying] community qualifications and boundaries for wind farm location.” He argues that community-based decision making is likely to result in “improved problem framing and decision making concerning wind farm location, and thus development.” The goal, as Hindmarsh notes, is a process that will be perceived as legitimate and fair, and thus sustainable. Reaching that goal might be considered overly optimistic, but at least some communities have shown a willingness to give it a try. There is at least a good prospect that these approaches can reduce contentiousness and move towards consensus on how to guide wind-park siting and zoning.

At the outset, this report noted that wind-park siting and zoning presents serious challenges and that proposals frequently attract public opposition and are therefore contentious. History does show that public attitudes about any new technology are subject to change over time, as experience is gained. History reminds us of a similar controversy, where over 300 people vigorously protested construction of a local project which they called “useless” and a “grotesque monster.” It was said that building it would be “a threat to public health, safety, and well-being.” Such was part of the initial reaction to constructing the Eiffel Tower. (Gipe, 1995, pp. 252-55). Only time will tell how apt that comparison might be.
References


Canadian Wind Energy Association. (Sep 2007). *Canadian wind energy association position on setbacks for large-scale wind turbines in rural areas (MOE Class 3) in Ontario*. [www.canwea.ca/municipalities/municipalities_bestpractices_e.php](http://www.canwea.ca/municipalities/municipalities_bestpractices_e.php)


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[www.socialacceptance.ch](http://www.socialacceptance.ch)


Appendix A:
State Survey Reports

The Appendix is bound separately and is available as a PDF file at the following URL:

http://www.nrri.org/pubs/electricity/NRRI_Wind_Siting_Survey_Jan12-03A.pdf
Appendix A: State Wind Siting and Zoning Survey
Acknowledgements

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- **Kai Goldynia**, from Okemos, Michigan, a sophomore studying History and Environmental Studies at Amherst College in Amherst, Massachusetts;
- **Francis Motycka**, from East Lansing, Michigan, a junior at The College of William and Mary, planning to double major in Economics and Government;
- **Lauren Teixeira**, from Silver Spring, Maryland, a sophomore at Grinnell College in Grinnell, Iowa; and
- **Marley Ward**, from St. Clair Shores, Michigan, a sophomore at the University of Michigan – Dearborn.

In addition, more than 100 individuals from all over the U.S. helped us check our survey work, including all those who helped identify the most appropriate in-state contact persons and especially those individuals listed as reviewers on the state survey reports.

The authors alone are responsible for any errors and omissions that remain.

Online Access

These survey reports can be accessed online via the National Regulatory Research Institute website at [http://www.nrri.org/pubs/electricity/NRRI_Wind_Siting_Survey_Jan12-03A.pdf](http://www.nrri.org/pubs/electricity/NRRI_Wind_Siting_Survey_Jan12-03A.pdf)

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Table A-1: State Wind Siting and Zoning Survey Summary Table
(26 Jan 2012)

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The authors intend to continue efforts to update the survey reports, as needed, to keep them up to date. New information to update the survey results are welcome. Comments can be submitted to:

Tom Stanton, Principal for Electricity
National Regulatory Research Institute
tstanton@nrri.org (517) 775-7764
State: Alabama

Wind siting basics: Investor-owned utilities providing retail electric service to the public must obtain a Certificate of Public Convenience and Necessity (CPCN) from the Alabama Public Service Commission (PSC) for construction of power generation facilities intended to serve the public. During its review, the Commission considers, among other things, the proposed facility location. However, the PSC has no specific siting authority over wind generation or generation facilities proposed by a non-regulated utility.

Other state entities that may have authority include: Alabama Department of Environmental Management; Alabama Department of Conservation and Natural Resources; local zoning authorities such as counties and cities; and circuit courts of the counties.

History of siting authority: The PSC does not have any history regarding the siting of wind turbines for the generation of power.

Approvals needed: Investor-owned utilities providing retail service to the public must obtain a Certificate of Public Convenience and Necessity (CPCN) from the Alabama Public Service Commission for construction of power generation facilities (Stemler, 2007).

Evaluation criteria: As part of its consideration of a regulated utility’s request for a CPCN to construct a power generation facility intended to serve the public, the PSC reviews data from the company, including: the type, location and cost of the proposed generation facility and related transmission facilities and upgrades; the company’s existing and planned resources; the company’s existing and forecasted reserve levels; and various demand and cost data germane to the request.

Public input: CPCN hearings are open to the public. In addition, any person or entity granted intervenor status may participate in the proceedings.

Relationships to other important energy policies or siting and zoning decisions: Alabama is a fully regulated market for retail electric service. Utilities under the jurisdiction of the PSC have a legal duty to maintain their facilities and proper reserve levels in order to render adequate service to the public and as necessary to meet the growth and demand of the service territory.

Contacts:

John Free, Director
Electricity Policy Division
Alabama Public Service Commission
100 N Union Street, RSA Union
Montgomery, AL 36104
john.free@psc.alabama.gov

Pam Thomas
Wildlife Section
Alabama Division of Wildlife and Freshwater Fisheries
64 North Union Street, Suite 584
Montgomery, AL 301457
Pam.Thomas@dcnr.alabama.gov
State Wind Siting and Zoning Survey

Citations and links:


Data gathered by Deborah Luyo, 3 Nov 2011
State: Alaska

Wind siting basics: The Regulatory Commission of Alaska (RCA) issues a Certificate of Public Convenience and Necessity to any utilities and independent power producers in the state. The RCA is not involved in siting activities. Depending on site land ownership and environmental impacts, permits for turbine sites are handled through the Alaska Department of Natural Resources and Division of Wildlife, the U.S. Army Corps of Engineers, Federal Aviation Administration (FAA), and Fish and Wildlife Service, and local governments.

History of siting authority: RCA does not provide a siting review; however, generating facilities serving ten or more persons are required to receive a CPCN. (See: www.fws.gov/midwest/wind/guidance/AFWASitingSummaries.pdf.)

Approvals needed: No state-level approval is needed. Some cities and municipalities have specific wind generator siting and zoning procedures.


Evaluation criteria: No state-level criteria.

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: Alaska’s Coastal Zone Management Program, run by the State Department of Natural Resources, used to serve as a one-stop shop for permitting issues involving the state’s coastal zones. The program was discontinued by the Alaska legislature this year, though, and restarting it could take as long as two to three years.1

Contacts:

Rich Stromberg, Wind Program Manager
Alaska Energy Authority
813 West Northern Lights Boulevard
Anchorage, AK 99503
(907) 771-3053
rstromberg@aidea.org

Citations and links:


Data gathered by Kai Goldynia, 7 Aug 2011.
State: Arizona

Wind siting basics: The state has no specific wind siting authority, codes, or regulations. Wind facilities must obtain siting and zoning approvals at the county level.

History of siting authority: The state has no specific wind siting authority.

Approvals needed: No state-level approval is needed for wind facilities. The Arizona Game & Fish Department provides voluntary guidelines for reducing wildlife endangerment during wind facility construction and operation.

The Arizona Power Plant and Transmission Line Siting Committee has the authority to approve a Certificate of Environmental Compatibility (CEC) for transmission lines 115kV or higher. The Arizona Corporation Commission (ACC) “must either confirm, deny or modify the certificate granted by the Committee or if the Committee refused to grant a certificate, the Commission may issue a certificate” (Arizona Corporation Commission).

Evaluation criteria: Voluntary guidelines issued by the AZ Game & Fish Department include:

1. Place turbines, roads, power lines, and other infrastructure appropriately, avoiding high-quality wildlife habitats.
2. Close, obliterate, and re-vegetate any roads constructed for the project that are not necessary for facility maintenance after tower construction.
3. Control or prevent erosion, siltation, and air pollution by vegetating or otherwise stabilizing all exposed surfaces.
4. Control or prevent damage to fish, wildlife, or their habitats.
5. Prevent or control damage to public and/or private property.

Public input: ACC decisions are made during public meetings, with opportunities for public comment.

Relationships to other important energy policies or siting and zoning decisions: The Arizona Renewable Energy Standard (15% by 2025) includes wind as an eligible technology. Arizona electric utilities must file with the ACC biennial integrated resource plans, including analysis and discussion of how the utility will meet the state’s renewable energy standard.

Pending issues: Major areas of concern are environmental and wildlife criteria, coupled with the development of a permitting process. Debate continues with regard to establishing comprehensive wind generator siting procedures. Currently, Arizona lacks any state regulation of wind facilities; however, with more facilities proposed, environmental groups worry about the increased impact on the physical and natural environment and habitats of vital plant and animal species. The Arizona Game & Fish Department is working with counties and the State Land Department to address wildlife concerns.

Contacts:

Ginger Ritter  
Arizona Game and Fish Dept.-WMHB  
(623)-236-7606  
GRitter@azgfd.gov
State Wind Siting and Zoning Survey

Ray Williamson
Arizona Corporation Commission
1200 W. Washington Street
Phoenix, AZ 85007
(602) 542-0828
www.cc.state.az.us/
RWilliamson@azcc.gov

Citations and links:


Data gathered by Kai Goldynia, 17, 19 Jul 2011.
State: Arkansas

Wind sitting basics: Wind siting is done at the local level of government.


Approvals needed: All electricity generating facilities that provide “a public service” are required to obtain a Certificate of Public Convenience and Necessity (CPCN) from the Arkansas Public Service Commission.

Evaluation Criteria: None identified.

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: None identified.

Contacts:

Diana Brenske, Director
Electric Section
Arkansas Public Service Commission
900 W Capitol Ave
Little Rock, AR 72201
(501) 682-5656
diana_brenske@psc.state.ar.us

J.D. Lowery, Renewable Energy Programs Manager
Arkansas Energy Office
Arkansas Economic Development Commission
(501) 682-7678
jlowery@arkansasedc.com

Citations and links:


Data collected by Francis Motycka, 6, 11 Jul, 3 August 2011.
Reviewed by J.D. Lowery, 18 Nov 2011.
**State:** California

**Wind siting basics:** Siting authority is delegated to municipalities. Every county is required to adopt a General Plan for wind development. However, they are subject to the California Environmental Quality Act (CEQA), which requires Environmental Impact Reports (EIRs) and imposes mitigation measures to reduce significant adverse impacts.

**History of siting authority:** The California Planning and Zoning Law was modified in 1980 to delegate land-use decisions to municipalities [http://leginfo.ca.gov/pub/09-10/bill/sen/sb_0001-0050/sbx8_34_bill_20100322_chaptered.pdf](http://leginfo.ca.gov/pub/09-10/bill/sen/sb_0001-0050/sbx8_34_bill_20100322_chaptered.pdf).

The California Environmental Quality Act (CEQA), passed in 1970, requires local governments’ permitting facilities to analyze wind generator environmental impacts [www.leginfo.ca.gov/cgi-bin/displaycode?section=prc&group=20001-21000&file=21000-21006](http://www.leginfo.ca.gov/cgi-bin/displaycode?section=prc&group=20001-21000&file=21000-21006).

**Approvals needed:** Approvals vary by municipality. It could come from the planning department, one or more planning commissions, administrative boards or hearing officers, the legislative body itself, or any combination thereof. Under CEQA, applicants are required to consult with the California Department of Fish and Game (CDFG) to meet fish and game statutes and wildlife protection laws; however, the CDFG cannot approve or disapprove of the application. If the project will occupy U.S. Bureau of Land Management (BLM) land, BLM approval is needed [www.blm.gov/ca/st/en/prog/energy/wind.html](http://www.blm.gov/ca/st/en/prog/energy/wind.html).

The applicant should first conduct an initial study of the environmental impacts of the project and prepare a document meeting the requirements of both the CEQA and the National Environmental Policy Act (NEPA). If in the initial study the county or the BLM finds potentially significant environmental impacts, the county and the BLM will hire an environmental consultant to conduct the more comprehensive Environmental Impact Report (EIR). Once this report is completed, the County Planning Commission will hold a public hearing to determine whether or not the EIR should be approved. EIR approval facilitates obtaining other necessary permits, such as a permit pursuant to the Endangered Species Act and a Conditional Use Permit (CUP), if the applicant is trying to build on certain types of land, like agricultural land. Once the applicant has acquired all the necessary permits (others include a stormwater discharge permit and a right-of-way from the BLM if the project involves BLM property), the applicant can file its application with the county.

**Evaluation criteria:** Required CEQA environmental impact analysis includes:

- aesthetics
- agricultural resources
- air quality
- biological resources
- geology and soils
- greenhouse gases
- hazards and hazardous materials
- hydrology and water quality
- land use and planning
- mineral resources
- noise
- population and housing
- public services
- recreation
- transportation and traffic
- utilities (meaning any required ancillary facilities, such as for wastewater or waste disposal)
For small wind generators (50kW or smaller), Assembly Bill 45 of 2009 authorizes counties to adopt siting ordinances. The Bill establishes maximum restrictions for tower height, parcel size, setbacks, public notice, and noise level (www.dsireusa.org/incentives/incentive.cfm?Incentive_Code=CA61R&re=1&ee=1).

**Public input:** No specific procedures identified.

**Relationships to other important energy policies or siting and zoning decisions:** None identified.

**Pending issues:** Proposed legislation, AB 13 (www.leginfo.ca.gov/pub/11-12/bill/asm/ab_0001-0050/abx1_13_bill_20110707_amended_sen_v95.pdf), seeks to expedite the wind siting process by expanding the “SB 34” (http://leginfo.ca.gov/pub/09-10/bill/sen/sb_0001-0050/sbx8_34_bill_20100322_chaptered.pdf) process, originally conceived to facilitate solar facility siting within the state’s Desert Renewable Energy Conservation Plan (DRECP). This bill would allow wind project applicants within the DRECP to pay fees to the CA Energy Commission to expedite project review and pay an in-lieu-of-mitigation fee to the state to ensure adequate wildlife and habitat protections when the project is sited.

**Contacts:**

Cheryl Lee  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102  
www.cpuc.ca.gov/renewables  
cheryl.lee@cpuc.ca.gov

Dr. C.P. (Case) van Dam  
Department of Mechanical and Aeronautical Engineering  
University of California, Davis  
One Shields Avenue  
Davis, CA 95616  
cpvandam@ucdavis.edu

Dr. Bruce R. White  
Department of Mechanical and Aeronautical Engineering  
University of California, Davis  
One Shields Avenue  
Davis, CA 95616  
brwhite@ucdavis.edu

Kate Zocchetti  
California Energy Commission  
Renewable Energy Program  
1516 Ninth Street, MS-45  
Sacramento, CA 95814-5512  
(916) 654-3945  
www.energy.ca.gov  
Kzocchet@energy.state.ca.us
Citations and links:

California Department of Fish and Game [web page]. Retrieved 22 Jun 2011 from www.dfg.ca.gov/


Data gathered by Lauren Teixeira, 22 Jun 2011.
State: Colorado

Wind siting basics: Wind facilities must be permitted by both the local and state governments. The Colorado PUC regulates: (1) “eligible renewable energy resources;” (2) facilities larger than 2 MW capacity; and (3) facilities exceeding 50 feet in height. By state law, each county must have a Master Plan, which includes information on how to make land-use decisions with respect to siting (Stemler, 2007). State enabling legislation encourages counties to consider “methods for assuring access to appropriate conditions for solar, wind, or other alternative energy sources” and “areas containing endangered or threatened species” in their plans.


Approvals needed: In general, applicants need one of these county government permits if the proposed facility’s capacity exceeds a certain threshold established by the county: a 1041 (a.k.a. Areas and Activities of State Interest) permit, special use permit, or conditional use permit. 1041 permits are generally required for the site selection and construction of transmission lines, power plants (renewable and non-renewable), and substations with capacities exceeding the county-specified limit.

The process generally includes a pre-application meeting, public notice, submittal of the permit application, public hearing, approval of the permit, and post-approval requirements, if applicable.

For more information on these permits, see Colorado Governor’s Energy Office report (p. 52; www.dora.state.co.us/puc/projects/TransmissionSiting/EnvironmentSitingLanduse_REDIProject_GEO07-20-2009.pdf).

Projects also need a Certificate of Public Convenience and Necessity (CPCN) from the PUC. The PUC is required to consult with the Colorado Division of Wildlife and the U.S. Fish and Wildlife Service. Those agencies usually determine requirements for wildlife impact studies. If the project is to be on federal land or triggers the National Environmental Policy Act (NEPA) in some way, studies must be conducted according to NEPA. The applicant must provide written documentation that consultation occurred with appropriate governmental agencies. In addition, if the project receives federal funding, involves federal land, or connects to a transmission line belonging to a federal power authority, the applicant must comply with the federal Endangered Species Act (ESA). Colorado is home to 10 endangered bird species.

The PSC checks to make sure the applicant has the consent of the relevant municipalities and will comply with the applicable zoning ordinances. An applicant can appeal a county zoning decision to the Commission and request a hearing. The PSC has the right to amend the CPCN.

Evaluation criteria: The County will either require or encourage the applicant to conduct an Environmental Impact Assessment (EIA). The Colorado Division of Wildlife requires avian and bat studies. Typically required permits include:

- County Conditional or Special use Permits
- County Building Permit
- County Septic System Permit
- State of Colorado Storm Water Permit (construction)
- State of Colorado Dust Controls Permit (construction)
- State of Colorado Highway Access and Enroachment Permit (tower and blade transportation)
- State of Colorado Water Well Permit
Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: Colorado has a renewable portfolio standard of 30% by 2020. Transmission projects are being developed to support wind (www.eei.org/ourissues/ElectricityTransmission/Documents/Trans_Project_V-X.pdf). However, a recent report by the Governor’s Energy Office found that CO might not be able to meet its RPS goal unless even more transmission lines are built (www.denverpost.com/business/ci_13913735).

Colorado Senate Bill 11-45 (June 2011) established a task force on statewide transmission siting and permitting, which will report to the governor on its recommendations for improving the state’s statutory and regulatory framework (www.dora.state.co.us/puc/projects/TransmissionSiting/SB11-45/SB11-45.htm). A report by the task force, submitted on 1 Dec 2011, recommended (Colorado Public Utilities Commission, 2011):

(1) ...increased cooperation and collaboration among local governments that review transmission applications in Colorado.
(2) When local government land-use decisions on utility projects are appealed to the PUC, and the PUC's decision is subsequently appealed, cases should go directly to the Colorado Court of Appeals, rather than to a district court in order to achieve more efficient and timely review.
(3) ...establishment of processes and provision of resources to resolve transmission siting and permitting disputes between local governments and transmission operators.

Contacts:

Tom Blickensderfer
CO Department of Natural Resources
(303)866-3157
t.blick@state.co.us

Richard Mignogna
Colorado Public Utilities Commission
1560 Broadway, Suite 250
Denver, CO 80202
(303) 894-2871
www.dora.state.co.us/PUC
richard.mignogna@dora.state.co.us

Tom Plant
Governor's Energy Office
1580 Logan Street
Suite 100
Denver, CO 80203
(303) 866-2100
www.colorado.gov/energy
geo@state.co.us

Citations and links:


Data collected by Lauren Teixeira, 7 Jul 2011; Deborah Luyo, 20 Oct 2011.
State Wind Siting and Zoning Survey

State: Connecticut

Wind siting basics: The Connecticut Siting Council has sole jurisdiction over electric generating facilities using renewable energy sources with more than 1 MW of capacity and of PURPA non-qualifying facilities under 1 MW.

History of siting authority: Connecticut statutes Sections 16-50g, 16-50k and 16-50x(d) (1971, as amended) grant authority to the Connecticut Siting Council (www.cga.ct.gov/2011/pub/chap277a.htm#Sec16-50j.html). A new law, Connecticut Public Act 11-245 (PA 11-245), effective 1 Jul 2011, requires the Connecticut Siting Council by 1 Jul 2012, in consultation with the departments of Public Utility Control and Environmental Protection, to adopt regulations concerning the siting of wind turbines. (See Pending Issues.)

Approvals needed: Electric generation facilities using renewable energy sources with more than 65 MW of capacity could have a “significant adverse environmental effect” and require a certificate from the Connecticut Siting Council. Electric generation facilities using renewable energy sources with fewer than 65 MW of capacity could have a “significant adverse environmental effect” and require a declaratory ruling from the Connecticut Siting Council.

The applicant for a certificate must consult the municipality in which it wishes to build at least 60 days prior to filing the application. Within 60 days of that consultation, the municipality must issue its recommendation to the applicant. The applicant must also consult the municipal zoning and inland wetland agencies. The agencies have 65 days after the time the application is filed to issue an order restricting or regulating the proposed site. Concerned parties have 30 days after the order is issued to appeal it to the Council. The Council can affirm, revoke, or modify the zoning or wetlands order. If the Council accepts the application, it must hold a public hearing in which all parties to the proceeding may offer testimony and file evidence. The Council can reject an application if it fails to comply with certain data requirements. The Council must render a decision within 180 days of receipt of the application. The suggested form and content of the application can be found here: www.ct.gov/csc/lib/csc/guides/guidesonwebsite042010/renewableenergyfacilityapplicationguide.pdf#51365.

Only two wind facilities have been approved in the state of Connecticut: BNE filed its petition to build its Colebrook South facility on 6 Dec 2010 and its petition to build its Colebrook North facility on 13 December 2010. Their petitions were approved on 2 June 2011 and 9 June 2011, a time frame of about six months; however, including the municipal consultation beforehand, the total time was probably a few months more.

Evaluation criteria: Prior to passage of PA 11-245, criteria included:

- consultation with state agencies and municipal commissions
- Applications including reviews of:
  - hazards to air traffic;
  - health and safety;
  - justification of selection of the proposed site, including a comparison with alternative sites that are environmentally, technically, and economically practicable;
  - explanation of why this project is necessary for the reliability of electric power supply of the state or is necessary for a competitive market for electricity;
  - description of the project’s proximity to certain areas
(www.ct.gov/csc/lib/csc/guides/guidesonwebsite042010/renewableenergyfacilityapplicationguide.pdf#51365.)
The applicant must include assessment of the “historic and expected availability” of necessary electric transmission infrastructure. This includes “[t]he construction type of the transmission interconnection (overhead, underground, single circuit, double circuit) and the existing and expected transmission line loadings, substation interconnection plan, and the anticipated range of dispatch based on transmission grid constraints. In addition, provide a final copy of, or a status report on, the independent system operator transmission grid interconnection study.”

Public input: A public hearing will be required under Connecticut Public Act 11-245. (See Pending issues.)

Relationships to other important energy policies or siting and zoning decisions:

The applicant must show how its proposed facility is consistent with the approved Integrated Resource Plan. The agency in charge of IRP is the Department of Energy and Environmental Protection (DEEP).

Pending issues: Regulations promulgated under PA 11-245 must at least consider (1) setbacks, including tower height and distance from neighboring properties; (2) flicker; (3) a requirement for the developer to decommission the facility at the end of its useful life; (4) different requirements for different size projects; (5) ice throw; (6) blade shear; (7) noise; and (8) impact on natural resources. The regulations must also require a public hearing for wind turbine projects.

PA 11-245, effective date 1 Jul 2011, bars the CT Siting Council from acting on any application or petition for siting a wind turbine until the new regulations are adopted (www.cga.ct.gov/2011/SUM/2011SUM00245-R03HB-06249-SUM.htm).

Contacts:

Linda Roberts, Executive Director
Connecticut Siting Council
(860) 827-2935
www.ct.gov/csc/site/default.asp
linda.roberts@ct.gov

Citations and links:


State Wind Siting and Zoning Survey

**State:** Delaware

**Wind siting basics:** Wind siting authority is at the local level.

**History of siting authority:** None identified.

**Approvals needed:** For an “Eligible Energy Resource,” which includes wind generators, the generation unit must be certified by the Delaware Public Service Commission. The Eligible Energy Resource can then register with PJM’s Environmental Information Services (EIS) Generation Attribute Tracking System (GATS; [www.pjm-eis.com/getting-started/about-GATS.aspx](http://www.pjm-eis.com/getting-started/about-GATS.aspx)), which tracks renewable energy credits (RECs) for compliance with state renewable portfolio standards (RPSs).

Developers should contact the Delaware Department of Natural Resources & Environmental Control, Regulatory Advisory Service ([www.dnrec.delaware.gov/SBA/Pages/RegulatoryAdvisoryService.aspx](http://www.dnrec.delaware.gov/SBA/Pages/RegulatoryAdvisoryService.aspx)). This Service will help identify all required state (and federal) permits, depending on the location of a proposed wind development. Examples include state-regulated wetlands, sediment and storm-water requirements for land disturbances, and federal coastal zone requirements.

**Evaluation criteria:** The following are criteria for wind siting on private property that may be used by county and municipal governments, as stated in Title 29, Chapter 80 of the Delaware Code:

1. **Historical:** “Any wind energy system shall be buffered from any properties or structures included on the Historic Register.”
2. **Property Setback:** “Wind turbines shall be setback 1.0 times the turbine height from [the] adjoining property line. Turbine height means the height of the tower plus the length of 1 blade.”
3. **Noise:** “The aggregate noise or audible sound of a wind system shall not exceed 5 decibels above the existing average noise level of the surrounding area and shall be restricted to a maximum of 60 decibels measured at any location along the property line to the parcel where the wind system is located.”
4. **Visual:** “Wind systems shall be free from signage, advertising, flags, streamers, any decorative items or any item not related to the operation of the wind turbine. Electric wiring for the turbines shall be placed underground for non-building integrated systems.”

**Public input:** No specific procedures identified.

**Relationships to other important energy policies or siting and zoning decisions:** Delaware has a renewable portfolio standard (RPS) requiring 25% of electricity sold by utilities to come from renewable energy sources by 2025 and imposing interim annual portfolio requirements.

**Research Issues:** The only current commercial wind turbine is on the University of Delaware-Lewes campus. The 2 MW wind turbine was constructed without any environmental permits. The University is completing a two-year research project to measure the impact of the school’s wind turbine on bird and bat mortality. The study is expected to be completed by December 2013.

**Contacts:**

Kimberly Chesser
Delaware Department of Natural Resources & Environmental Control (DNREC)
[Kimberly.Chesser@state.de.us](mailto:Kimberly.Chesser@state.de.us)
Courtney Stewart  
Delaware Public Service Commission  
861 Silver Lake Blvd.  
Cannon Bldg., Suite 100  
Dover, DE 19904  
(302) 736-7500  
www.state.de.us/delpsc/default.shtml  
courtney.stewart@state.de.us

Citations and links:


Database of State Incentives for Renewables & Efficiency. Delaware Incentives/Policies for Renewables & Efficiency [web page]. Retrieved 11 July 2011 from  

http://delcode.delaware.gov/title26/c001/sc02/index.shtml,  

Delaware Department of Natural Resources and Environmental Control (DNREC), Environmental Permits [web page]. Retrieved 11 Jul 2011 from  
www.dnrec.delaware.gov/Pages/default.aspx.


Delaware Public Service Commission [web page]. Retrieved 11 Jul 2011 from  


Data gathered by Francis Motycka, 6, 11, 12, Jul, 4 Aug 2011; Tom Stanton, 30 Aug 2011.  
Reviewed by Courtney Stewart and Kimberly Chesser, 30 Aug 2011.
Jurisdiction: District of Columbia

Wind siting basics: None identified.

History of siting authority: None identified.

Approvals needed: None identified.

Evaluation criteria: None identified.

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: Washington, DC has a renewable energy portfolio standard of 20% by 2020 (Database of State Incentives for Renewables & Efficiency, 2011).

Contacts:

Roger Fujihara
DC Public Service Commission
1333 H Street, NW, Suite 200
Washington, DC 20005
(202) 625-0558
www.dcpsc.org
rfujihara@psc.dc.gov

Emil King
Energy Division
District Department of the Environment
2000 14th Street, NW, 300 East
Washington, DC 20009
(202) 673-6700
http://ddoe.dc.gov/ddoe
emil.king@dc.gov

Citations and links:

Database of State Incentives for Renewables & Efficiency. (29 Aug 2011). District of Columbia Incentives/Policies for Renewables & Efficiency [web page].
www.dsireusa.org/incentives/incentive.cfm?Incentive_Code=DC04R&re=1&ce=1.
State: Florida

Wind siting basics: Currently, all applicants proposing to build a wind farm must obtain a variety of permits from various federal and state agencies. There is one-stop permitting for power plants 75 MW and over; however, Florida has yet to extend this process to wind. If the farm is to be on state land, the applicant needs approval from the state Siting Board (the governor and the cabinet).

History of siting authority: Since Florida’s Power Plant Siting Act (www.dep.state.fl.us/siting/power_plants.htm) does not apply to wind farms, applicants must obtain all of the necessary permits one by one. The necessary permits are laid out on the Florida Department of Environmental Protection (DEP) website: www.dep.state.fl.us/siting/files/renew_resource_permitting.pdf

Approvals needed: The applicant must obtain approval, either through a permit or authorization, from a variety of federal and state agencies, including: the Federal Aviation Administration, the U.S. Fish and Wildlife Service, the Florida Department of Transportation, the Florida Fish and Wildlife Conservation Commission, the Florida Department of Business and Profession Regulation, the Florida Department of Environmental Protection (sub-agencies: Bureau of Beaches; Stormwater Program; State Lands; District offices), and the Florida Office of Historic Preservation

Evaluation criteria: On the federal level, the applicant must issue a Notice of Proposed Construction concerning height restrictions to the Federal Aviation Administration. A wildlife permit from the U.S. Fish and Wildlife Service is also required.

On the state level, the following authorizations and permits are required:

- Access and roadway (Florida Department of Transportation)
- Migratory Bird Nest Removal and Relocation Permit (Florida Fish and Wildlife)
- Business incorporation (Florida Department of State)
- Business license (Florida Department of Business and Profession Regulation)
- Coastal Construction Control Line (Florida DEP Bureau of Beaches)
- Environmental resources permit (Florida DEP District Office)
- National Historical Preservation Act Compliance (Florida Office of Historic Preservation)
- National Pollutant Discharge Elimination System (NPDES) Stormwater Permit for Construction (Florida DEP Stormwater Program)
- State Lands Determination Waterways (Florida DEP State Lands)

On the county level, the following authorizations and permits are required:

- Building
- Business license
- County wetlands
- Land-use determination
- Local fire marshal
- Noise ordinance
- Zoning

Palm Beach County, which is in the process of approving Florida’s first wind farm, has “Alternative Energy Development Guidelines,” which the County Council voted to amend in order to accommodate the height of the proposed turbines.

Public input: Some counties include public hearings in the zoning process.
Relationships to other important energy policies or siting and zoning decisions: None identified.

Pending issues: Florida is currently in the process of siting what might be its first wind farm. A few years ago, Florida Power and Light attempted to site a 20 MW wind farm on Hutchinson Island in St. Lucie County, but the initiative failed because of widespread public opposition and because three of the turbines were to be on public land. Right now, Wind Capital Group, St. Louis, Missouri, has applied to build an 80-turbine, 150 MW wind farm in the Everglades agricultural area in Palm Beach County. The project has come into question in light of a recent U.S. Fish and Wildlife analysis that identifies concerns for avian mortality. The Fish and Wildlife Service has recommended a more comprehensive study.

Contacts:

Cindy Mulkey
DEP Siting Coordination Office Program Manager
850-245-2175
cindy.mulkey@dep.state.fl.us

Citations and links:


Data collected by Lauren Teixeira, 26 Jul 2011.
Reviewed by Cindy Mulkey, 8 Nov 2011.
State: Georgia

Wind sitting basics: Georgia has no specific siting authority for wind power. Regulation is administered by local government. (Stemler, 2007).

Approvals needed: Most local governments require a land-use permit (Georgia Wind Working Group).

Evaluation criteria: Voluntary siting and land-acquisition guidelines for developers, created by the Georgia Wind Working Group, include:
- Aesthetic impacts
- Avian and bat mortality
- Noise
- Possible construction impacts
- Utility interconnection impacts

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: None identified.

Contacts:

Kristofer Anderson
Georgia Environmental Finance Authority
wind@gawwg.org

Rita Kilpatrick
Southern Alliance for Clean Energy
Kilpatrick@cleanergy.org

Jim Ozier
Georgia Department of Natural Resources
116 Rum Creek Drive
Forsyth, GA 21029
(478) 994-1438
Jim_ozier@dnr.state.ga.us

Citations and links:


Data collected by Deborah Luyo, 4 Nov 2011.
Reviewed by Rita Kilpatrick and members of the Georgia Wind Working Group, 19 Dec 2011.
State Wind Siting and Zoning Survey

State: Hawaii

Wind sitting basics: Wind production in Hawaii is mainly small scale, and siting procedures are administered by local government (Stemler, 2007). Environmental reviews are conducted at the federal, state, and county levels. No guidelines specific to wind energy have been developed. Regulation is administered through general permitting guidelines (Hawaii Clean Energy Initiative, 2010).

History of siting authority: None identified.

Approvals needed: At the federal level, permits and reviews include: Environmental Impact Statement, Environmental Assessment, administered by the Council on Environmental Quality; Incidental Take Statement, Incidental Take Permit, administered by the National Oceanic and Atmospheric Administration; Incidental Take Statement, Incidental Take Permit, administered by the U.S. Fish & Wildlife Service. At the state level, most environmental permits are administered by the Hawaii Department of Health (DOH); however, depending on the project, other agencies may also issue permits. All counties in Hawaii require a Shoreline Setback Variance for structures and activities in the “Shoreline Area”; counties have their own guidelines for determining the required setback from shore. A Special Management Area Permit is also required. A utility permit, administered by the Public Utilities Commission (PUC), is required for all utility construction, reconstruction, or maintenance activities in Hawaii. (Hawaii Clean Energy Initiative, 2010).

Projects that qualify for the Renewable Energy Facility Siting Process (REFSP) can pursue a streamlined permitting process. To obtain streamlined permitting, the developer will be charged a fee to cover application processing costs.

Evaluation criteria: The most important determination is the impact of the project on the environment and wildlife.

Public input: A public comment period and public hearing are part of the process at both the state and federal levels.

Relationships to other important energy policies or siting and zoning decisions: Hawaii has a renewable portfolio standard of 40% by 2030. In 2008, a Memorandum of Understanding between the state of Hawaii and the U.S. Department of Energy established the Hawaii Clean Energy Initiative (http://apps1.eere.energy.gov/news/pdfs/hawaii_mou.pdf). Goals of this initiative include a significant increase in the use of renewable energy and a transition to the exclusive use of renewable energy on Hawaii’s smaller islands. (Database of State Incentives for Renewables & Efficiency, 2011).

Contacts:

Malama Minn, Wind Energy Specialist
Hawaii State Energy Office
(808) 587-3809
malama.c.minn@dbedt.hawaii.gov

Paul Conry, Administrator
Division of Forestry and Wildlife
Department of Land and Natural Resources
(808) 587-0166
Paul.J.Conry@hawaii.gov
Citations and links:


Data collected by Deborah Luyo, 1 Nov 2011.
State Wind Siting and Zoning Survey

State: Idaho

Wind siting basics: Local-government siting autonomy, with state enabling legislation.


Approvals needed: Developers apply for local zoning approval, for a “Conditional Use Permit.” Since there is local siting autonomy, only a city council or board of county commissioners can approve wind energy projects (www.legislature.idaho.gov/idstat/Title67/T67CH64SECT67-6504.htm).

Evaluation criteria: None identified.

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: None identified.

Contacts:

Sandy Cardon
Boise State Wind Working Group
sandycardon@boisestate.edu

John Chatburn, Administrator
Idaho Office of Energy Resources
304 N. 8th Street, Ste. 250
Boise, ID
(208) 332-1660
john.chatburn@oer.idaho.gov

Citations and links:


Data collected by Marley Ward, 10 Jul 2011.
Reviewed by John Chatburn 22 Nov 2011.
**State:** Illinois

**Wind siting basics:** Local government has autonomy. Each county can set standards (55 ILCS 5/5-12020). These standards include the device height and number of electricity-generating wind devices, or wind turbine generators (WTGs) (www.ilga.gov/legislation/ilcs/ilcs4.asp?DocName=005500050HArt.+5&ActID=750&ChapterID=12&SeqStart=55300000&SeqEnd=120400000).


**Approvals needed:** County approves construction for projects in accordance with local zoning regulations. In some situations, county must consult Illinois Department of Natural Resources for approval (see Great Lakes Commission Staff, 2009, *Siting and Permitting Wind Farms in Illinois*).

Projects have to demonstrate compliance with these federal requirements:

1. Federal Aviation Administration (FAA): (a) Determination of No Hazard to Air Navigation; (b) Notice of proposed construction (form FAA 7460-1); (c) Lighting plan; (d) Post construction form (form FAA 7460-2).


3. US Army Corps of Engineers (COE): (a) Clean Water Act: Section 404 - Discharge of Fill Materials; (b) Rivers and Harbors Act: Section 10.


Obtain approval from municipality, National Pollutant Discharge Elimination System (NPDES) permit from Illinois Environmental Protection Agency, and road permit from Department of Transportation (*Siting and Permitting Wind Farms in Illinois*). At least one public hearing will take place not more than 30 days prior to a county board’s siting decision (55 ILCS 5/5-12020).

**Evaluation criteria:** Standards are set at the county level.

According to the Illinois Endangered Species Act, the Illinois DNR must be consulted for approval if proposed project would take place in an area where an endangered species or its habitat might be disrupted.

Illinois has no model ordinance in place. However, a maximum setback limit for WTGs is established for self-service power. According to (55 ILCS 5/5-12020), “[A] county may not require a wind tower or other renewable energy system that is used exclusively by an end user to be set back more than 1.1 times the height of the renewable energy system from the end user’s property line.”

**Public input:** No specific procedures identified.

**Relationships to other important energy and siting and zoning decisions:** None identified.

**Contacts:**

Jolene S. Willis, Wind Energy Program Coordinator  
Value-Added Sustainable Development Center  
Illinois Institute for Rural Affairs  
Western Illinois University  
1 University Circle  
Macomb, IL 61455-1390  
(309) 298-2835  
[www.iira.org](http://www.iira.org)  
JS-Willis@wiu.edu

**Citations and links:**


Data collected by Marley Ward, 1 Jul 2011; Lauren Knapp, 17 Aug 2011.  
State: Indiana

**Wind siting basics:** Indiana has no state-level regulations or guidelines for wind power development. Wind power siting is administered at the local level of government. Siting and permitting requirements vary according to location. (Stemler, 2007).

**History of siting authority:** Article 4. (24 Apr 2007). Electric Utilities – 170 IAC 4-4.1-1
[www.in.gov/legislative/iac/T01700/A00040.PDF](http://www.in.gov/legislative/iac/T01700/A00040.PDF).

**Approvals needed:**
- A certificate of need, granted by the Indiana Utility Regulatory Commission, is required for construction of a new power plant or for delivery of public utility service.
- An National Pollutant Discharge Elimination System (NPDES) Permit is required for discharge of stormwater runoff at construction sites having a size greater than one acre.
- A permit from the Indiana Department of Natural Resources is required for excavation, placement, modification, or repair of a permanent structure over, along, or lakeward of the shoreline or water line of a freshwater lake. (Great Lakes Commission, 2009).
- Any person who desires to erect, make, use, or maintain a structure, an obstruction, or an excavation in or on the floodway first must obtain a Construction in a Floodway permit from the Indiana Department of Natural Resources.

**Evaluation criteria:** All projects must comply with local and state laws governing electric generation and transmission and environmental laws related to construction (Great Lakes Commission, 2010).

**Public input:** No specific procedures identified.

**Relationships to other important energy policies or siting and zoning decisions:** Indiana’s Clean Energy Portfolio Standard establishes a voluntary goal of 10% clean energy by 2025 (Database of State Incentives for Renewables & Efficiency, 2011).

**Contacts:**

Matt Buffington, Environmental Supervisor
DNR Division of Fish and Wildlife
(317) 233-4666
mbuffington@dnr.IN.gov

Patrick Flynn, Program Manager
Renewables and Vehicle Technologies
Indiana Office of Energy Development
pflynn@oed.in.gov

**Citations and links:**


Great Lakes Commission. (Jan 2010). *State and Provincial Land-Based Wind Farm Siting Policy in the Great Lakes Region: Summary and Analysis.*


Data collected by Deborah Luyo, 2 Nov 2011.
Reviewed by Matt Buffington, 9 Nov 2011.
State: Iowa

Wind siting basics:

Local government only: facilities with <25 MW capacity
Dual state and local siting: >25 MW capacity
State utilities board has authority at the state level.

History of siting authority: Iowa Code chapter 476A (1977) established generation-siting law. In 2001, the decision criteria for issuance of generation certification were revised. The Iowa Utilities Board can now waive certification requirements for any size facility. (www.legis.state.ia.us/IACODE/2003/476A/)

Approvals needed: A permit from the Iowa Utilities Board is required for larger facilities; otherwise, local zoning and siting regulations apply; Iowa Code 476A and Iowa Administrative Code Chapter 24 (www.legis.state.ia.us/IACODE/2003/476A/).

Cases are presented to the Iowa Utilities Board to apply for a Construction Approval Waiver; Iowa code 476A and Administrative Code Chapter 24 (199-24.15) (www.legis.state.ia.us/IACODE/2003/476A/15.html). The IUB has waived the plant certification process for several projects that would have otherwise required a full certificate proceeding.

Evaluation criteria:

“a. …consistent with the legislative intent… and the economic development policy of the state, and will not be detrimental to the provision of adequate and reliable electric service…include[ing] whether the existing transmission network has the capability to reliably support the proposed additional generation…
b. Whether the construction, maintenance, and operation…will be consistent with reasonable land use and environmental policies…considering available technology and the economics of available alternatives. Such determination shall include:
(1) Whether all adverse impacts attendant the construction, maintenance and operation of the facility have been reduced to a reasonably acceptable level;
(2) Whether the proposed site represents a reasonable choice among available alternatives;
(3) Whether the proposed facility complies with applicable city, county or airport zoning requirements….
c. Whether the applicant is willing to construct, maintain, and operate the facility pursuant to the provisions of the certificate and the Act.
d. Whether the proposed facility meets the permit and licensing requirements of regulatory agencies.
e. The applicant shall use the applicable provisions in the publications listed below as standards of accepted good practice unless otherwise ordered by the board:

I. Iowa Electrical Safety Code...
II. National Electrical Code...


Public input: Intervenors are allowed to participate in proceedings. Office of Consumer Advocate generally represents residential customers. An informational meeting and hearing (if the case has contested issues) must be held in the county where the facility is proposed to be built.
State Wind Siting and Zoning Survey

**Relationships to other important energy and siting/zoning decisions:** Generally, a generation certificate is issued contingent upon the applicant receiving appropriate approvals and permits from other state and local zoning authorities.

**Contacts:**

Parveen Baig, Utilities Regulation Engineer  
Iowa Utilities Board  
1375 E. Court Avenue  
Des Moines, IA 50319  
(515) 725-7343  
www.state.ia.us/iub  
parveen.baig @iub.iowa.gov

**Citations and links:**


Data gathered by Marley Ward, 29 June 2011.  
Reviewed by Parveen Baig, 5 Dec 2011.
State: Kansas

Wind siting basics: Local siting autonomy (State Enabling Legislation).

History of siting authority: Kansas Statutes Annotated 12-573
http://kansasstatutes.lesterama.org/Chapter_12/Article_7/12-741.html

Approvals needed: Approval rests with the city’s governing body and county commissioners.
http://kansasstatutes.lesterama.org/Chapter_12/Article_7/12-753.html


KEC suggests an application process including at least the following:
- site plan
- visual impact assessment
- environmental assessment
- economic assessment
- decommissioning and reclamation plan


(1) That wind power facilities should be sited on previously altered landscapes, such as areas of extensive cultivation or urban and industrial development, and away from extensive areas of intact native prairie, important wildlife migration corridors, and migration staging areas.


(3) To support the study of and establishment of standards for adequate inventory of plant and animal communities before wind development sites are selected, during construction, and after development is completed (Manes et al., in review). The resultant improvement in available knowledge of wind power and wildlife interactions obtained through research and monitoring should be used to periodically update guidelines regarding the siting of wind power facilities.

(4) That mitigation is appropriate only if significant ecological harm from wind power facilities cannot be adequately addressed through proper siting.

(5) To support the establishment of processes to ensure a comprehensive and consistent method in addressing proposed wind power developments.

(6) To advocate the direct coupling of energy conservation and efficiency programs with any new measures aimed at increasing energy supply whether renewable or conventional.”

Additionally, voluntary guidelines offered by the Kansas Energy Council’s Wind Siting Handbook (http://kec.kansas.gov/reports/wind_siting_handbook.pdf) include:

Pre-construction survey recommendations: Requiring environmental assessment in siting decisions; consideration for the biological setting; use of biological and environmental experts; careful review if legally protected wildlife. Land use regulation is solely under the purview of local governments.
State Wind Siting and Zoning Survey

Design/Operation Recommendations: Perches should not be allowed on nacelles; tower design should not provide perches for avian predators; awareness of the potential for adverse effects of turbine warning lights on migrating birds.

Site Development Recommendations: Development in large, intact areas of native vegetation is discouraged; power lines should be buried if possible; turbines should not interfere with important wildlife or livestock movement corridors and staging areas.

Consultation with wildlife agency, USFWS: Contact with appropriate resource management agencies early in the planning process.

Mitigation requirements: Mitigation for habitat loss when significant ecological damage in the siting of a wind power facility cannot be avoided.

Decommissioning recommendations: Plans for future site decommissioning and restoration, including circumstances under which decommissioning and reclamation may occur and the expected end of the project life.

Public input: No specific procedures identified.

Relationships to other important energy and siting/zoning decisions: None identified.

Contacts:

Eric Johnson
Kansas Department of Wildlife, Parks and Tourism
eric.johnson@ksoutdoors.com

Citations and links:


State: Kentucky

**Wind siting basics:** Kentucky’s wind energy potential is considered small. No precedent has been established for the siting and zoning of wind developments. The Kentucky State Board on Electric Generation and Transmission Siting (Siting Board) or the Public Service Commission would have authority over major wind developments. ([www.fishwildlife.org/files/Kentucky.pdf](http://www.fishwildlife.org/files/Kentucky.pdf)).

According to the Kentucky Integrated Resource Plan, most of the state has Class 2 (out of 7) wind speeds, making wind power generation economically impractical using currently available technology. A 2011 study by the Department of Economics at Western Kentucky University, entitled *Wind Energy Feasibility in Kentucky*, found that the wind resource in one major region of Kentucky (featuring Cumberland County) can produce affordable electricity. Statewide siting and zoning regulations could be developed as a result of this study. ([www.wku.edu/jaep/html/documents/JAEPVol2708.pdf](http://www.wku.edu/jaep/html/documents/JAEPVol2708.pdf))

**History of siting authority:** None identified.

**Approvals needed:** Siting Board approval is required for merchant plants with a generating capacity of 10 MW or more. For obtaining local government approval, local zoning board rules apply.

**Evaluation criteria:** None identified.

**Public input:** No specific procedures identified.

**Relationships to other important energy policies or siting and zoning:** None identified.

**Contacts:**

Kate Shanks  
Division of Renewable Energy  
500 Mero Street, 6th Floor, Capital Plaza Tower  
Frankfort, KY 40601  
(502) 564-7192  
Kate.Shanks@ky.gov

**Citations and links:**


Data gathered by Kai Goldynia, 2 August 2011.  
Reviewed by Kate Shanks, 24 Oct 2011.
State Wind Siting and Zoning Survey

**State:** Louisiana

**Wind siting basics:** Louisiana has no specific siting authority for wind.

**History of siting authority:** None identified.

**Approvals needed:** None identified.

**Evaluation criteria:** None identified.

**Public input:** No specific procedures identified.

**Relationships to other important energy policies or siting and zoning decisions:** None identified.

**Contacts:**

Bryan Crouch  
Technology Assessment/Energy Office  
Louisiana Department of Natural Resources  
[John.Crouch@LA.GOV](mailto:John.Crouch@LA.GOV)

Michael Seymour, Ornithologist & Scientific Collecting Permits Coordinator  
Louisiana Department of Wildlife & Fisheries  
Louisiana Natural Heritage Program  
2000 Quail Drive, Room 429  
P.O. Box 98000  
Baton Rouge, LA 70898-9000  
(225) 763-3554  
[mseymour@wlf.louisiana.gov](mailto:mseymour@wlf.louisiana.gov)

**Citations and links:**

Database of State Incentives for Renewables & Efficiency. *Louisiana Incentives/Policies for Renewables & Efficiency* [web page]. Retrieved 8 Nov 2011 from  
[www.dsireusa.org/incentives/index.cfm?getRE=1?re=undefined&ee=1&spv=0&st=0&srp=1&state=A](http://www.dsireusa.org/incentives/index.cfm?getRE=1?re=undefined&ee=1&spv=0&st=0&srp=1&state=A).


Data collected by Deborah Luyo, 8 Nov 2011.  
Reviewed by Beau Gregory, 9 Dec 2011.
State: Maine


For projects located within the expedited permitting area for wind energy development:

- All of the organized areas of Maine are designated for expedited permitting. If a project is wholly located within organized areas, then the Maine Department of Environmental Protection (DEP) is the permitting authority at the state level. The municipality may also require a permit.
- If a project is wholly located within the unorganized areas of the state, then the Maine Land Use Regulation Commission (LURC) is the permitting authority at both the state and municipal levels.
- If a project is located within the expedited permitting area for wind energy development and is partially located within the organized areas of the state and partially located within the unorganized areas, then DEP may choose to be the permitting authority or may opt to review only the portion of the project located in the organized areas. In this case, LURC would review the portion in the unorganized areas.2

For projects not located in the expedited permitting area of the state, LURC is the permitting authority. In this case, a rezoning would be required first, followed by a development permit.


In 2008 Maine implemented SP 980, which amended the Maine Wind Energy Act to provide for “expedited” siting and establish specific concerns about visual impact and benefits to the community (www.mainelegislature.org/legis/bills/bills_123rd/billtexts/SP090801.asp).

Approvals needed: Depending on the site plans and location, approvals may be needed from: Independent [Transmission] System Operator for New England (ISO-NE), Maine Department of Environmental Protection (DEP), Maine Public Utilities Commission (PUC) (for installations interconnecting at >100kV), the Natural Resources Council of Maine (NRCM), and the U.S. Army Corps of Engineers (COE). The Maine Department of Inland Fisheries and Wildlife (IFW) is a reviewer of permit applications for DEP and LURC.

Basic procedures:

1. Pre-application meeting(s) with the applicant and the relevant agencies – DEP and/or LURC, IFW, US Army Corps of Engineers, and others as needed – to discuss processing
2. Submit application
3. Permitting authority conducts review to determine whether application is complete for processing
4. Public meetings or hearing

2 Unorganized areas are those having no local, incorporated municipal government; government is shared by various state agencies and county government. Organized areas are those having a local government that is incorporated.
5. Deliberation and decision
6. Appeals, if any
7. Begin construction

For more information on the LURC process:

The DEP procedure is outlined in Maine’s Site Location Law:
www.maine.gov/dep/land/sitelaw/index.html

**Evaluation criteria:**

The Maine Wind Energy Act, section 9, provides:
- Applicants are required to submit “visual impact assessments” if the project is within three miles of scenic resources. “Scenic resources” are defined in the Act.
- The project must result in “tangible benefits” to the host community.

DEP criteria (www.maine.gov/dep/land/sitelaw/index.html):
- No adverse effect on the natural environment” standard of the Site Location Law (www.maine.gov/dep/land/sitelaw/index.html#rule)
- No unreasonable adverse effect on air quality
- No unreasonable alterations of climate
- No unreasonable alterations of natural drainage ways
- No unreasonable effects on runoff/infiltration relationships
- No adverse effects on surface water quality
- No unreasonable adverse effects on ground water quality or quantity
- Sound-level limits
- Preservation of historic sites
- Preservation of natural areas
- No unreasonable effect on scenic character
- Protection of wildlife and fisheries

LURC criteria:
- Effect on scenic character and related existing uses related to scenic character
- Tangible benefits
- Public safety-related setbacks

Smaller-scale developments (Other than utility scale) (www.mainelegislature.org/legis/bills/bills_123rd/billtexts/SP090801.asp):
- Projects must meet noise control requirements
- Projects must be designed and sited to avoid unreasonable adverse shadow flicker effects
- Setbacks must be adequate to protect public safety

**Public input:** Applicants, petitioners, and other interested persons may request a public hearing. Hearings may be continued and reconvened as circumstances require.

**Relationships to other important energy and siting/zoning decisions:** None identified.

**Pending issues:** Many towns in Maine have already drafted or are in the process of drafting wind-specific ordinances.
Contacts:

Maine Department of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017
(207) 287-7688
(800) 452-1942
www.maine.gov/dep/contact/index.html

Maine Land Use Regulation Commission
22 State House Station
Augusta, Maine 04333-0022
(207) 287-2631
www.maine.gov/doc/lurc/

Citations and links:


Reviewed by Marcia Famous Spencer, 27 Dec 2011.
State Wind Siting and Zoning Survey

State: Maryland

Wind siting basics: For any electric generator 70 MW or greater, including wind-based generation, the Maryland Public Service Law requires the Maryland Public Service Commission (Commission) to issue a Certificate of Public Convenience and Necessity (CPCN) that authorizes the construction and operation of the facility. (PUC §§ 7-207 and 208 (http://law.justia.com/codes/maryland/2005/gpu/7-207.html, http://law.justia.com/codes/maryland/2005/gpu/7-208.html and www.fishwildlife.org/files/Maryland.pdf.)

History of siting authority: The current state siting law was enacted by Chapter 31 of the Laws of 1971. In 2001, by Chapter 655, the General Assembly began to exempt certain types of generation from the CPCN process if the facility does not exceed 70 MW and meets certain specified criteria. The exemption provision is codified in PUC Article § 7-207.1 (2005) (http://law.justia.com/codes/maryland/2005/gpu/7-207.1.html). In 2007, the General Assembly enacted Chapter 163 which allows land-based wind generation facilities to seek an exemption from the CPCN process if the facility will not exceed 70 MW. (PUC §7-207.1 and CPCN Exemptions: FAQ at http://webapp.psc.state.md.us/, and http://esm.versar.com/pprp/ceir15/Report_1_1_2.htm).


To initiate the process, a developer must file an application with the Commission that contains descriptive information as to ownership, interconnection, and specified environmental and socioeconomic information. Depending upon the type of generation being proposed as well as the location, the type of information and impact analysis required will vary. The necessary contents of the application and supporting information may be found in Chapter 79 of Title 20 of the Code of Maryland Regulations (COMAR) (www.dsd.state.md.us/comar/subtitle_chapters/20_Chapters.aspx#Subtitle79). For facilities applying for an exemption, the requirements are specified in COMAR 20.79.01.03 (www.dsd.state.md.us/comar/SubtitleSearch.aspx?search=20.79.01.*). Certain basic information, such as ownership, a facility description and location, and interconnection information, is required in either case.

For facilities required to obtain a CPCN, the Power Plant Research Program (PPRP) of the Maryland Department of Natural Resources (DNR) coordinates the state agency review and environmental evaluation. DNR is one of seven state agencies that review and comment on every application for a CPCN. The agencies include the Maryland Departments of Natural Resources, Environment, Agriculture, Business & Economic Development, Transportation, and Planning and Maryland Energy Administration. Once the review is completed, PPRP consolidates the findings of these agencies and represents them along with the state’s recommended licensing conditions to the Commission as part of the Commission’s hearing process. All facilities must be constructed and operated in compliance with state and federal requirements (www.dnr.state.md.us/bay/pprp/pp_brochure.html).

Regardless of whether a developer applies for a CPCN or for an exemption, the process begins with an application to the Commission. If a facility requires a CPCN, the Commission will usually delegate the application to the Commission’s Hearing Office for assignment to a Public Utility Law Judge. The Law Judge sets a prehearing conference to establish a process for completing the application and developing a record to support the Commission’s ultimate decision whether to grant the CPCN or not. The CPCN process will involve adjudicatory and public hearings. The time for completing the process depends upon the complexity of the proposed facility, the extent of environmental and socio-economic impacts, and public input – positive or negative. The process can take several months to a year or more. State law requires that the application be filed two years before construction is to commence, but this requirement may be, and usually is, waived upon request. If the facility is requesting an exemption, the Commission
may consider the matter itself without assigning it to the Hearing Division, or it may delegate the matter to a Law Judge. The Law Judge will establish a public hearing process and ensure that the applicant meets the requirements for an exemption. The implementing regulations are set 90 days from the date of application for a decision unless otherwise directed by the Commission. COMAR 20.79.01.03 (www.dsd.state.md.us/comar/SubtitleSearch.aspx?search=20.79.01.*). In exemption proceedings, there are no compliance requirements imposed by the Commission itself beyond a requirement to ensure electrical safety and reliability. The Commission is required to hold at least one public hearing and may issue an exemption if it finds that it is in the public interest to do so. There may be local zoning requirements and state and local environmental compliance requirements outside of the CPCN process itself, such as stormwater management, non-tidal wetlands, and sediment control.

**Evaluation criteria:** The state of Maryland has drafted guidelines for wind power siting; however, these guidelines have yet to be implemented. Criteria in the draft guidelines include:

1. Assess species of concern
2. Minimize seasonal disturbance during construction
3. Avian and bat breeding seasons
4. Lighting issues

**Public input:** Both the PSC CPCN process and the related process for exempting qualifying generators include public input procedures.

**Relationships to other important energy policies or siting and zoning decisions:** The Maryland Renewable Energy Standard (20% by 2022) includes wind as an eligible technology.

In 2003, two commercial wind projects (one for 100 MW and one for 40 MW) each went through a licensing process and obtained a CPCN to construct and operate wind generation facilities in Garrett County, Maryland. A third facility proposing to build another 40-50 MW also received a CPCN to construct a facility in Garrett County but with limitations placed on the siting of its wind turbines. Since then, all proposed commercial wind developments to date have been smaller than 70 MW.

**Pending issues:** The major issues are implementing the draft siting process guidelines and establishing procedures for siting offshore wind developments.

**Research issues:** Bird and bat activity studies in western Maryland, bat activity in the Mid-Atlantic Bight (a coastal region spanning from Cape Cod, Massachusetts to Cape Hatteras, North Carolina), bat migration and population size studies, benthic habitat studies in the Maryland Wind Energy Area, assessments of the wind resource offshore of Maryland, techniques for optimizing turbine array layouts.

**Contacts:**

Gwen Brewer, Science Program Manager
MD Department of Natural Resources
(410) 260-8558
gbrewer@dnr.state.md.us

Andrew Gohn, Senior Clean Energy Program Manager
MD Energy Administration
(410) 260-7190
agohn@energy.state.md.us
State Wind Siting and Zoning Survey

Citations and links:


Data collected by Kai Goldynia, 4 Aug 2011.
Reviewed by Andrew Gohn, 17 Nov 2011.
State: Massachusetts

Wind siting basics: The Energy Facilities Siting Board is the siting authority for facilities with capacities of 100 MW or larger. At this level there is a “one-stop” permitting process. Siting of < 100 MW facilities is subject to municipal or regional permitting. No on-shore wind facilities over 100 MW have been proposed or built in Massachusetts.

History of siting authority: The authority of the Massachusetts Siting Board over energy facilities with > 100 MW of capacity is established by Massachusetts General Law Chapter 164, Section 69H (www.malegislature.gov/Laws/General Laws/PartI/TitleXXII/Chapter164/Section69H)

Approvals needed: On the federal level, the applicant usually needs the approval of the Environmental Protection Agency (EPA), Fish and Wildlife Agency, and the Federal Aviation Administration (FAA). On the state level, permits are generally required under the Massachusetts Environmental Policy Act (MEPA) and the Massachusetts Natural Heritage Program (MNHP). The Department of Environmental Protection (DEP) and the Endangered Species program could also regulate the project.

Since permitting in Massachusetts occurs on a local level, the procedure will vary according to the local bylaw or ordinance. Most procedures involve conducting a pre-construction survey, submitting the application, holding a public hearing, opportunity for appeals, and then a final approval granted (or denial issued) by the permitting authority.

The siting and permitting process for wind projects in Massachusetts can take an exceptionally long time. Under the Massachusetts “citizen suit statute” citizens can appeal any state or local approved permit (Chapter 21E, Section 15 www.malegislature.gov/Laws/GeneralLaws/PartI/TitleII/Chapter21E/Section15). This law allows a group of 10 or more citizens to challenge a permit. Some municipalities have recently adopted “as-of-right zoning” in designated locations, which allows wind projects in the designated zones to proceed without a special permit (Department of Energy Resources, 2011).

Evaluation criteria:

The Massachusetts Department of Energy Resources has developed two model by-laws/ordinances, one for siting projects subject to a special permit and another that allows projects to be sited without a special permit in designated locations. Generally, these bylaws include standards that address:

- Design Standards, including height
- Safety and Environmental Standards, including Setbacks, Shadow/Flicker, and Sound - must comply with DEP noise regulations (www.airandnoise.com/MA310CMR710.html)
- Monitoring and Maintenance
- Abandonment or Decommissioning

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: None identified.

Pending issues: The Wind Energy Siting Reform Act (S. 1666 – Finegold, H. 1775 – Smizik, and others3), currently before the Joint Committee on Telecommunications, Utilities and Energy, would:

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3 S. 1666 is the language of the conference report that made it to enactment stage in 2009-2010 session. H. 1775 is the House counterpart.
State Wind Siting and Zoning Survey

- Mandate that the Siting Board establish clear and predictable state siting standards for wind facilities; the standards must be as protective as existing state laws.

- Ensure municipalities would still establish and apply their own local standards.

- Provide for one-stop permitting at the local level and one stop at the state level for wind projects over 2 MW.

- Maintain home rule. (A municipality is free to reject any wind project, and the Siting Board has no authority to override that decision. Instead, the proponent’s only remedy is to go to court – the same remedy as at present.)

- Provide for appeals. (If a municipality approves a wind project, opponents would appeal to the Siting Board. Appeal of a Siting Board ruling would go directly to the State Supreme Judicial Court.)

- Decrease the permitting process from eight years to 18 months, with an additional year if there is a judicial appeal.

Contacts:

Bram Claeys  
Massachusetts Department of Energy Resources  
100 Cambridge Street – Suite 1020  
Boston, MA 02114  
(617)626-7874  
Bram.claeys@state.ma.us

Jody Lally, Program Manager  
Wind Energy Center  
University of Massachusetts  
(413) 577-0887  
lally@ecs.umass.edu

Citations and links:


Department of Energy Resources, Massachusetts Executive Office of Environmental Affairs. (Jun 2011). *Model As-of-Right Zoning Ordinance or By-law: Allowing Use of Wind Energy Facilities or By-laws*  

www.thefreelibrary.com/Developing+wind+power+projects+in+Massachusetts%3a+anticipating+and+-a0172525557.


State Wind Siting and Zoning Survey

State: Michigan

Wind siting basics: Michigan is a home-rule state. Local townships, villages, cities, and counties are responsible for wind siting and zoning. The state government has responsibility for identifying one or more Wind Energy Resource Zones, where transmission construction will be facilitated (see www.michigan.gov/windboard and http://www.michigan.gov/mpsc/0,1607,7-159-16393_52375---.00.html).

History of siting authority: None identified.

Approvals needed: No state permit process exists for construction of wind farms. Local land use and zoning regulations apply.

All construction projects can trigger the need for permits:

1. Soil Erosion and Sedimentation Control – obtained from the appointed county or municipal enforcing agency
2. National Pollutant Discharge Elimination System (NPDES) – Construction activities of 1 acre or more with a point-source discharge to waters of the state are required to submit a Notice of Coverage (NOC) to obtain coverage under Permit by Rule from the Michigan Department of Environmental Quality.
3. Shoreline Construction from the State of Michigan Department of Environmental Quality
4. Wetland Construction from the State of Michigan Department of Environmental Quality
5. Sand Dune Construction from the State of Michigan Department of Environmental Quality

These processes are expected to take no more than a few months. A Soil Erosion and Sedimentation Control permit is required for all construction projects. Other permits are required, depending on location.

In addition, developers apply to the local township(s) or municipalities, and sometimes county(ies), for land-use permits (see http://expeng.anr.msu.edu/miwind/zoning_siting).

Like many other states, Michigan faces the challenge of implementing wind technology on the local, community scale. If zoning exists in a city, village, township, or county with its own existing zoning, the provisions adopted must be pursuant to the Michigan Zoning Enabling Act (2006 PA 110; http://legislature.mi.gov/doc.aspx?mcl-Act-110-of-2006). Some Michigan townships rely on county zoning, in which case the township must work with county planning commissions so that wind generator provisions are included in the county’s zoning ordinance pursuant to the Michigan Zoning Enabling Act. Where zoning does not already exist, regardless of city, village, or township, it is not possible to adopt regulations without first adopting zoning (Michigan Department of Labor and Economic Growth, 2008).

Evaluation criteria: Some local governments have passed wind energy ordinances. Common evaluation criteria include:

1. Property Setback
2. Sound Pressure Level
3. Safety
4. Visual Impact
5. Electromagnetic Interference

Public input: No specific procedures identified.
Relationships to other important energy policies or siting and zoning decisions:

The Wind Energy Resource Zone Board (WERZ Board) was created by the Michigan Public Service Commission (MPSC) in Dec 2008 for the purpose of identifying regions in the state with the greatest potential for harvest of wind energy. In its final report, the WERZ Board determined two geographical zones with the highest estimated generating capacity.

In one of those zones, a transmission construction project has been approved to accommodate future wind generation. The Michigan Public Service Commission granted an expedited siting certificate to ITC Transmission for construction of a transmission line and four substations in Michigan’s Thumb region, considered the state’s highest wind energy resource zone. Appeals to this decision were filed by the Association of Businesses Advocating Tariff Equity (ABATE) and the Michigan Public Power Agency (MPPA) and Michigan Municipal Electrical Association (MMEA).

Contacts:

John Sarver, Chairman,
Michigan Wind Working Group
(517) 290-8602
johnsarver3@gmail.com

Julie Baldwin, Renewable Energy Section Manager
Michigan Public Service Commission
(517) 241-6115
Baldwinj2@michigan.gov

Citations and links:


Phadke, Roopali. *Understanding Wind Initiative.*
www.macalester.edu/understandingwind/index.html.


Data collected by Kai Goldynia, 28 June 2011; Deborah Luyo, 19 Oct 2011.
State: Minnesota

Wind sitting basics: In 2005, the Minnesota Legislature transferred to Minnesota Public Utilities Commission (PUC or Commission) from the Minnesota Environmental Quality Board (MEQB) the permitting authority for wind facilities greater than or equal to 5 MW in capacity (Minnesota statute, Chapter 216F [Wind Energy Conversion Systems] [www.revisor.mn.gov/statutes/?id=216F]. Siting authority for facilities < 5 MW is reserved for local jurisdictions.

Section 216F.08 allows counties to assume authority for permitting of facilities with capacities of up to 25 MW if they, as a minimum, adopt the Commissions’ General Permit Standards (www.revisor.mn.gov/statutes/?id=216F.08).

History of sitting authority: In 1995, the Minnesota legislature enacted legislation that excluded wind energy facilities from the requirements of the Power Plant Siting Act, established a review process specific to wind energy facilities and authorized the MEQB to adopt rules specific to large wind energy conversion systems. (www.revisor.mn.gov/laws/?doctype=Chapter&year=1995&type=0&id=203). Minnesota statute 216F.02 gives local governments authority over wind farms less than 5 MW: www.revisor.mn.gov/statutes/?id=216f.02.

Approvals needed: The Commission, in making its determination on whether to issue a final site permit, relies on standards, criteria, and factors in Minnesota Rules parts 7850.4000 and 7850.4100 (https://www.revisor.mn.gov/rules/?id=7850) and the record developed in the review process governed by Minnesota Rules, Chapter 7854 (https://www.revisor.mn.gov/rules/?id=7854). Commission site permit requirements address site designation, setbacks and site layout restriction, compliance procedures, surveys and reporting, construction and operation practices, final as built documents, decommissioning, restoration and abandonment, and special conditions as warranted. The Commission’s website at www.puc.state.mn.us/PUC/energyfacilities/siting-routing/index.html provides access to each project docket, which contains the primary documents associated with a project, and eDockets, which contains all of the documents associated with an individual project.

Other permits required for LWECS construction may also include:

Minnesota Public Utilities Commission

Certificate of Need (for facilities generating 50 MW or more). www.puc.state.mn.us/portal/groups/public/documents/pdf_files/001075.pdf

Minnesota Department of Transportation

Utility Permit (Long Form) - www.dot.state.mn.us/utility/files/pdf/permits/long-form-complete.pdf

Utility Permit (Short Form) www.dot.state.mn.us/utility/files/pdf/permits/short-form-complete.pdf


Oversize/Overweight Permits Page - www.dot.state.mn.us/cvo/oversize/forms_and_applications.html

County and Township Road permits

In Minnesota, it is common practice for wind developers and counties to enter into development agreements that provide for designation of haul roads, assessment of road and infrastructure conditions prior to construction, damages, restoration, and ditch requirements. The following link
State Wind Siting and Zoning Survey

(www.lrrb.org/trafcalc.aspx) provides a downloadable interactive document that provides web links, sample ordinances, reports, traffic calculators to quantify the traffic impact on roads, public policy options to recapture roadway maintenance costs, experience from current projects, and research information. This site will provide updates when available.

Tall Structure Permits

Wind energy conversion systems near airports may require a permit from the Minnesota Department of Transportation. Additional information is available on the Department's Aeronautics and Aviation website. Minnesota Pollution Control Agency NPDES Permit www.pca.state.mn.us/index.php/water/water-types-and-programs/stormwater/construction-stormwater/construction-stormwater.html?menuid=&redirect=1. This may also include and/or satisfy the Soil Erosion and Sediment Control Plan.

Noise Standards. The project must comply with Minnesota Rules Chapter 7030 (www.revisor.leg.state.mn.us/rules/?id=7030) for setbacks from defined facilities.

Minnesota Department of Natural Resources

Permits to cross public lands and waters (www.dnr.state.mn.us/waters/watermgmt_section/pwpermits/applications.html)

Native Prairie: turbines and associated facilities shall not be place in native prairie unless approved in a native prairie protection plan (www.dnr.state.mn.us/prairierestoration).

Minnesota Board of Water and Soil Resources

Wetland Conservation Act (WCA) (www.bwsr.state.mn.us/wetlands/forms/form03_B.PDF)

Other PUC Site Permit and or Study Requirements

Archaeological Resource Survey and Consultation (through State Historic Preservation Office (www.mnhs.org/shpo/).

Avian and Bat Protection Plan: Avian and Bat Assessments, Survey and Monitoring Requirements

Shadow Flicker Modeling, Analysis and Mapping

Noise Modeling, Analysis and Mapping and Post Construction Noise Surveys

Demonstrate Control of Wind Rights

Wind Access Buffer: Turbine towers must be placed a minimum of 5 rotor diameters (RD) from all boundaries of site on the prevailing wind directions and 3 RD on the non-prevailing directions, unless otherwise approved by the Commission.

Internal Turbine Spacing Requirements: Turbine towers must be placed a minimum of 5 rotor diameters apart on the prevailing winds directions and a minimum of 3 RD on the non-prevailing winds within the permitted site boundaries, unless otherwise approved by the Commission

Off-Air TV Analysis
AM and FM Radio Reports

Licensed Microwave Report

Land Mobile Report

Freestanding permanent MET Towers

For projects under the authority of the local jurisdiction, the applicant must obtain the appropriate land use and zoning permits, depending on the ordinance.


Public input: Commission rules include provisions for application distribution requirements, public notice, public meetings, public hearings, and other procedural requirements (https://www.revisor.mn.gov/rules/?id=7854).

The Commission makes a final decision within 180 days of the acceptance of the application. If the project is approved, a permit is issued with any conditions the Commission considers necessary to protect the environment, enhance sustainable development, and promote the efficient use of resources. Minn. Rules 7854 | LWECS Permitting Flowchart.

Relationships to other important energy policies or siting and zoning decisions:
Minnesota law provides for the creation of wind and solar easements for solar and wind-energy systems. The Commission’s site permit wind access buffer requirements protect the wind rights of both project participants and non-participants (See Minn. Stat. 500.30).

Pending issues: Health effects and Avian and bat issues.

Research issues: Avian and bat issues.

Contacts:

Minnesota Department of Commerce
Energy Facility Permitting
85 7th Place East, Suite 500
St. Paul, MN 55101
(651) 297-2375 or 1-800-657-379
http://mn.gov/commerce/energy/utilities/Energy-Facility-Permits.jsp
www.energyfacilities.puc.state.mn.us/contact.html

Citations and links:

http://wiki.glin.net/download/attachments/950461/Minnesota.doc.

www.puc.state.mn.us/PUC/energyfacilities/index.html.

https://www.revisor.mn.gov/statutes/?id=216F.

State Wind Siting and Zoning Survey

**State:** Mississippi

**Wind siting basics:** Mississippi has no specific siting authority for wind.

**History of siting authority:** None identified.

**Approvals needed:** None identified.

**Evaluation criteria:** None identified.

**Public input:** No specific procedures identified.

**Relationships to other important energy policies or siting and zoning decisions:** None identified.

**Contacts:**

Johnny Wilson, Staff Officer  
Central District  
Mississippi Public Service Commission  
Jackson Office  
501 West St  
Jackson, MS 39201  
(601) 961-5442  
www.psc.state.ms.us/Commissioners/central/staff.html  
johnny.wilson@psc.state.ms.us

**Citations and links:**

Database of State Incentives for Renewables & Efficiency. *Mississippi Incentives/Policies for Renewables & Efficiency* [web page]. Retrieved 6 Nov 2011 from  
www.dsireusa.org/incentives/index.cfm?getRE=1?re=undefined&ee=1&spv=0&st=0&srp=1&state=MS.


Data collected by Deborah Luyo, 6 Nov 2011.
State Wind Siting and Zoning Survey

State: Missouri

Wind siting basics: Local siting autonomy (Environmental Law Institute, 2011).

History of siting authority: None identified.

Approvals needed: There is no specific approval process; however, the Public Service Commission and Department of Natural Resources can have input and provide oversight, depending on the location and facilities planned. Otherwise, wind energy facilities are subject only to existing local government zoning regulations (Association of Fish and Wildlife Agencies).

Local government grants permit for construction if project is in compliance with zoning laws. (Association of Fish and Wildlife Agencies).

Evaluation criteria: None identified.

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: None identified.

Contacts:

Doyle Brown
Policy Coordination Unit
Missouri Department of Conservation
(573) 522-4115 ext. 3355
doyle.brown@mdc.mo.gov

Michael Taylor
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
(573) 526-5880
Michael.Taylor@psc.mo.gov
www.psc.mo.gov/

Citations and links:


Data collected by Marley Ward, 1 Jul 2011.
State Wind Siting and Zoning Survey

State Name: Montana

Wind sitting basics: Wind power development on private land is generally not government regulated, but under a statewide permit, persons disturbing more than one acre of land are required to file a Storm Water Pollution Prevention Plan with the Montana Department of Environmental Quality. The Montana Department of Environmental Quality can regulate projects impinging on wetlands, water quality, and the like (www.fishwildlife.org/files/Montana.pdf). Each county controls zoning for commercial and industrial development. The Montana Department of Natural Resources and Conservation must approve projects on state owned land.

History of siting authority: None identified.

Approvals needed: No specific wind energy siting or zoning approvals are needed from state or local agencies. If the project encroaches on wildlife, or impacts the human environment, environmental reviews may be necessary.

Only projects requiring a state permit or approval are subject to review under the Montana Environmental Policy Act (MEPA). If a wind project is determined to require MEPA review, an Environmental Assessment (EA) and/or Environmental Impact Statement (EIS) is required. One of the functions of an EA is to document whether there is potential for a significant impact. If there is a potential significant impact, an EIS must be prepared by the permitting agency. An EIS details the purpose of the project, describes the areas and resources affected, and reviews alternatives including the no action alternative and possible measures to reduce adverse impacts. Public participation is discretionary during EA review, but mandatory for EIS review.

Evaluation criteria: No specific criteria identified. Permits may be required from the Department of Environmental Quality depending on circumstances involving:

1. Electric Transmission
2. Open-cut Mining
3. Wastewater
4. Water Quality

Public Input: Public participation is a vital tool during the Environmental Impact Statement review and may be required during a state agency during preparation of an Environmental Assessment. The agency must provide at least a 30-day period for comments on the draft EIS and must not make a decision for a 15-day period following publication of a final EIS. The 30-day comment period may be extended for up to an additional 30 days unless the state agency is doing a joint review with a federal agency. In addition, the state agency must inform the public of its decision and its justification for that decision.

Relationships to other important energy policies or siting and zoning decisions: Montana’s RPS requires that all public utilities obtain 15% of their electricity supply from qualified renewable energy resources by 2015.

Contacts:

Tom Kaiserski
Montana Wind Working Group
(406) 841-2034
tkaiserski@mt.gov
State Wind Siting and Zoning Survey

Brian Spangler  
Department of Environmental Quality  
1520 East 6th Avenue  
Helena, MT 59601-4541  
(406) 841-5250  
bspangler@mt.gov

T.O. Smith  
Montana Fish, Wildlife & Parks  
406-444-3889  
tosmith@mt.gov

Citations and Links:


Data collected by Kai Goldynia, 12 Jul 2011.  
Reviewed by Tom Kaiserski, 12 Jan 2012, Tom Ring, 18 Jan 2012.
State: Nebraska

**Wind sitting basics:** Nebraska is the only state where all electric power is publicly owned. As such, all power is regulated by the legislature, a local utility, or the Nebraska Power Review Board (NPRB).

**Under 80 MW:** Applicants connecting to the electric grid must obtain a power purchase agreement with a local utility and comply with local ordinances. Applicants must receive approval prior to construction either from the Federal Energy Regulatory Commission using the PURPA certification process, or from the NPRB. Customer generators (net metering) with a generator under 25 kilowatts rated capacity are exempt from the NPRB approval requirement.

**Over 80 MW:** Applicants must obtain NPRB approval prior to construction. The approval criteria the NPRB must use is set out in Neb. Rev. Stat. § 70-1014 (1996) ([www.nprb.state.ne.us/prbmanual/4.html](http://www.nprb.state.ne.us/prbmanual/4.html)). A special generation application process is available under Neb. Rev. Stat. § 70-1014.01(2) if filed by a Nebraska utility for a renewable energy project and the total production from all such facilities does not exceed 10 percent of the utility’s total energy sales. Approval of special generation applications is allowed if the applicant conducts a public hearing on the proposed project.

**Wind-for-export project:** Private developers wishing to construct renewable generation facilities can file an application using special NPRB approval criteria if at least 90 percent of the power will be exported outside Nebraska. The developer must offer certain public power utilities 10 percent of the renewable-generated electricity. The utilities can negotiate – the utilities do not have to purchase 10 percent. This process is set out in Neb. Rev. Stat. § 70-1014.02.

The Nebraska Power Review Board’s approval criteria in Neb. Rev. Stat. § 70-1014 for generation and transmission facilities are based on public convenience and necessity, cost-effectiveness, and feasibility, as well as whether the proposed facility will duplicate existing facilities. The Board also determines issues relating to territorial disputes between utilities and is the repository for all Nebraska electric power suppliers’ certified service areas.

**History of siting authority:** The authority of the Nebraska Power Review Board is statutory law: [www.powerreview.nebraska.gov/powerlaws.htm](http://www.powerreview.nebraska.gov/powerlaws.htm)

Terms for wind-for-export projects are defined in Section 70-1014.02, which was added in 2010. [http://uniweb.legislature.ne.gov/laws/laws-index/chap70-full.html](http://uniweb.legislature.ne.gov/laws/laws-index/chap70-full.html)

Community-Based (C-BED) legislation was added in 2007, Sections 70-1901 to 70-1907: [http://nebraskalegislature.gov/laws/laws-index/chap70-full.html](http://nebraskalegislature.gov/laws/laws-index/chap70-full.html)

**Approvals needed:** Approval is also needed from: the Federal Aviation Administration, the Department of Defense, and the Nebraska Game and Parks Commission. The developer must notify either the Nebraska Game and Parks Commission or the U.S. Wildlife Agency. The project will receive a thumbs up/thumbs down from federal and state wildlife agencies as a unit. The NPRB is required to consult with the Nebraska Game and Parks Commission on all applications to ensure that approval will not cause harm to threatened or endangered species or their critical habitat. The Game and Parks Commission will notify the NPRB of its determination. The NPRB will also coordinate with the Nebraska Department of Aeronautics, the State Historical Society and the Nebraska Commission on Indian Affairs.

Omaha Public Power District, the Municipal Energy Agency of Nebraska, and NPPD have all solicited wind resources through requests for proposals (RFPs). NPPD expects to need 533MW of wind generation in order to meet its goal of 10% renewables by 2020. The NPPD RFP process is as follows:
The NPPD submits an RFP, specifying a capacity and general location for the facility. Developers can propose projects on NPPD land or privately owned land.

Developers submit their proposals during the RFP time period. (The second most recent RFP, which closed 15 Apr 2009, yielded 22 proposals.)

The NPPD evaluates the proposals and develops a short list.

From this shortlist the NPPD Board of Directors must approve a power purchase agreement.

**Evaluation criteria:** Energy cost to NPPD, cost of transmission, developers’ experience, and environmental impact.

Counties drafting ordinances usually consult the NPPD. Setback distances are recommended by the U.S. Bureau of Land Management.

**Public input:** No specific procedures identified.

**Relationships to other important energy policies or siting and zoning decisions:** C-BED legislation gives landowners first right to wind energy development and provides a sales and use tax exemption on the gross receipts from the sale, lease, or rental of personal property for use in a C-BED project ([http://uniweb.legislature.ne.gov/laws/statutes.php?statute=s7727004057](http://uniweb.legislature.ne.gov/laws/statutes.php?statute=s7727004057)).

**Contacts:**

Jerry Loos  
Nebraska Energy Office  
P.O. Box 95085  
1111 “O” Street #223  
Lincoln, NE 68509-5085  
(402) 471-3356  
[www.neo.ne.gov/](http://www.neo.ne.gov/)  
Jerry.Loos@nebraska.gov

David Ried, P.E., Division Manager  
Energy Marketing & Trading  
Omaha Public Power District  
444 So 16th Street Mall, 10E/EP 1  
Omaha, NE 68102-2247  
(402) 514-1025  
dried@oppd.com

Tim Texel  
Executive Director and General Counsel  
Nebraska Power Review Board  
P.O. Box 94713  
Lincoln, NE 68509  
(402) 471-2301  
tim.texel@nebraska.gov

**Citations and links:**

State Wind Siting and Zoning Survey


Data collected by Lauren Teixeira, 11 Jul 2011.
Reviewed by Jerry Loos, 5 Jan 2012; David Ried, 5 Jan 2012; Tim Texel, 9 Jan 2012.
State: Nevada

Wind siting basics: Wind siting is done at the local level. The Public Utilities Commission of Nevada issues a permit for construction of renewable electric generating plants, including wind, with a nameplate capacity of 70 MW or more.

History of siting authority: Utility Environmental Protection Act; Nevada Revised Statutes § 704.820 through 704.900 (1971) (www.leg.state.nv.us/nrs/nrs-704.html). Nevada is a Dillon’s Rule state.

Approvals needed: Approval at the county level is needed. Applicants are required to file with the Nevada PUC, including a summary of environmental impact and need. The applicant must also submit a copy to the Division of Environmental Protection, Nevada Department of Conservation and Natural Resources, and Nevada State Clearinghouse. Within 150 days, the PUC will grant or deny the application.

Approximately 85% of Nevada land is federal property, where environmental studies are required by the federal Bureau of Land Management. Such studies are thorough and usually take up to two years (for an environmental assessment; EA) or three years (for an environmental impact statement; EIS).

Evaluation criteria: A community does not have authority to deny approval of a wind energy system if the owner has written consent from all owners of properties within 300 feet of the system and meets all of the local jurisdiction’s ordinances for wind energy systems if in effect (Database of State Incentives for Renewables & Efficiency, Nevada Solar and Wind Easements & Rights Laws).

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: Nevada’s most recent renewable portfolio standard (RPS) mandates that 25% of energy must come from renewable sources by 2025. Portfolio energy credits (PECs) are used to facilitate the buying and selling of renewable energy to meet portfolio standards. One PEC is equal to one kilowatt-hour (kWh) produced from a non-solar renewable source.

Contacts:

Larry Burton
Burton Consulting, LLC
(775) 852-1400
lburton@nvenergy.com

Thomas Clark
Nevada State Wind Working Group
(775) 325-3035
tclark@hollandhart.com

Tom Darin
Western Representative
American Wind Energy Association
(720) 244-3153
tdarin@awea.org
State Wind Siting and Zoning Survey

Mark Harris, PE
Public Utilities Commission of Nevada
Engineering Division
1150 E. William Stree
Carson City, NV 89701
(775) 684-6165
http://pucweb1.state.nv.us/PUCN/
mpharris@puc.nv.gov

Citations and links:


Data collected by Francis Motycka, 6, 11 Jul 2011, 4 Aug 2011.
Reviewed by Mark Harris, 31 Oct 2011.
State: New Hampshire

Wind siting basics:

**Small Wind:** Wind siting is done at the local level of government. However, developers of facilities larger than 5 MW and smaller than 30 MW can petition the New Hampshire Site Evaluation Committee (SEC) for a Certificate for Site and Facility, which would preempt local jurisdiction (www.nhsec.nh.gov/rules/index.htm).

**Large Wind:** The NH SEC has overall siting authority for energy facilities 30 MW or over, as demonstrated by its decision-making authority in RSA 162-H:16, II (www.gencourt.state.nh.us/rsa/html/XII/162-H/162-H-16.htm). The committee works closely with the host community(ies) to ensure orderly development of the region and incorporates local interests as much as possible in a decision as long as the preamble to RSA 162-H is not compromised. Local ordinances, etc. are not binding on the NH SEC. The NH SEC possesses the authority to supersede the local host community(ies) if its requirements conflict with the preamble of the law (RSA 162-H:1, www.gencourt.state.nh.us/rsa/html/XII/162-H/162-H-1.htm) in favor of the greater good.


Approvals needed: For Large Wind, the New Hampshire Energy Facility Siting Evaluation Committee (SEC) provides a Certificate of Site and Facility.

Within 60 days of submitting an application to the SEC, a decision will be made to either accept or deny the application. If an application is deemed incomplete, the applicant has 10 days to make corrections or choose to begin anew. Within five months, all state agencies involved are to submit to the SEC reports of progress and list any additional information required for permits. Within eight months, the state agencies are to report their final decisions regarding their respective jurisdictions. Within nine months of the application’s acceptance date, the SEC makes a decision to either issue or deny the certificate.

Evaluation criteria: The SEC must determine that the project:

- Applicant has adequate financial, technical, and managerial capability to assure construction and operation of the facility in continuing compliance with the terms and conditions of the certificate.
- Will not unduly interfere with the orderly development of the region, with due consideration having been given to the views of municipal and regional planning commissions and municipal governing bodies.
- Will not have an unreasonable adverse effect on aesthetics, historic sites, air and water quality, the natural environment, and public health and safety.

(1) Environmental impact: The New Hampshire Fish & Game Department reviews potential impacts to wildlife. The New Hampshire Natural Heritage Bureau focuses on the potential impact to endangered species and plants.

(2) Historic sites: The New Hampshire State Historic Preservation Office is responsible for historic and cultural resource issues.

(3) Stormwater and wetlands: New Hampshire Department of Environmental Services is responsible for storm water runoff, wetlands, and alteration of terrain.

Public input: The SEC subcommittee must hold at least one public hearing after acceptance of the application, and another after submission of final decisions from participating state agencies (www.nhsec.nh.gov/rules/index.htm).
Relationships to other important energy policies or siting and zoning decisions: New Hampshire’s Renewable Energy Portfolio mandates that 23.8% of electric generation must come from renewable sources by 2025. Wind energy, among others, is listed as a Class I energy source. Class I energy sources must increase by 1% every year from 2011 through 2025, reaching 16% by 2025.

Contacts:

Timothy W. Drew, Administrator  
Public Information and Permitting Unit  
New Hampshire Department of Environmental Services  
29 Hazen Drive; PO Box 95  
Concord, NH 03302-0095  
(603) 271-3306  
timothy.drew@des.nh.gov

Jack Ruderman  
New Hampshire Public Utilities Commission  
21 South Fruit Street Suite 10  
Concord, NH 03301  
(603) 271-2431  
www.puc.nh.gov  
jack.ruderman@puc.nh.gov

Citations and links:

Database of State Incentives for Renewables & Efficiency. (7 Feb 2011). New Hampshire Incentives/Policies for Renewables & Efficiency [web page].  


**State Name:** New Jersey

**Wind Siting Basics:** New Jersey has no specific wind siting authority.


New Jersey Statute § 40:55D-66.12, 16 Jan 2010. *Municipal ordinances relative to small wind energy systems* www.njleg.state.nj.us/2008/Bills/AL09/244_.PDF.


**Approvals needed:** Approval is needed from the Department of Environment Protection and from local governments through the planning and zoning commission. Offshore wind power, considered the greatest source of wind power potential in New Jersey, is subject to state coastal zone management rules.

There are two general types of wind energy generation projects in New Jersey; net metered systems interconnected behind an electric customer’s meter and merchant wholesale power generators. Developers of net metered generation facilities must file an interconnection application with the Electric Distribution Company serving the potential “customer-generator”. The state’s Board of Public Utilities (NJBPU) promulgates regulations governing how the state’s franchise Electric Distribution Companies interconnect and net meter NJ Class I renewable resources, including wind energy.

Developers of new wholesale merchant power generation facilities must file an application with the PJM Interconnection. The PJM will conduct a review, which includes preliminary feasibility, impact and cost allocation studies.

**Evaluation criteria:** Pre-construction requirements for projects located in the coastal zone (Four distinct regions are included in New Jersey’s coastal zone. Standards for determination of boundaries differ among regions.) include:

- Visual and Audio Bird Surveys
- Migratory Bat surveys
- Radar Surveys

Post construction monitoring is also required (NJ Department of Environmental Protection, 2010).

**Public Input:** No specific procedures identified.

**Relationships to other important energy policies or siting and zoning decisions:** New Jersey’s renewable portfolio standard requires that each electricity supplier or provider serving retail electric customers in the state’s competitive generation marketplace procure 22.5% of electricity sold from renewable sources by 2021 (Database of State Incentives for Renewables & Efficiency, 2010).
Contacts:

B. Scott Hunter  
Renewable Energy Program Administrator  
Office of Clean Energy  
New Jersey Board of Public Utilities  
44 S. Clinton Ave., POB 350  
Trenton, NJ 08625-0350  
b.hunter@bpu.state.nj.us

Ted Nichols, Principal Biologist  
Division of Fish and Wildlife  
New Jersey Department of Environmental Protection  
tnichols@gtc3.com

Citations and Links:


**State:** New Mexico

**Wind siting basics:** Local siting with local autonomy for projects up to 300 MW (Environmental Law Institute, 2011). The New Mexico Public Regulation Commission has authority for projects greater than 300 MW. State agencies have the authority to override local decisions, if they are not within the guidelines of Section 62-9-3 of the 2009 New Mexico Code (http://law.justia.com/codes/new-mexico/2009/chapter-62/article-9/section-62-9-3/).


**Approvals needed:** Approval of projects by county government is based on zoning laws.

New Mexico’s Public Regulation Commission has no process for review of potential wind projects.

**Evaluation criteria:** Guidelines from the New Mexico Department of Game & Fish include:

- Turbines should not be place in documented locations of any species of wildlife, fish or plant protected under the Federal Endangered Species Act.
- Turbines should not be located in known local bird migration pathways or in areas where birds are highly concentrated, unless mortality risk is low.
- Turbines should not be placed near known bat hibernation, breeding, and maternity/nursery colonies, in migration corridors, or in flight paths between colonies and feeding areas.
- Configure turbine locations to avoid areas or features of the landscape known to attract raptors (hawks, falcons, eagles, owls).
- Configure turbine arrays to avoid potential avian mortality where feasible.
- Avoid fragmenting large, contiguous tracts of wildlife habitat.
- Avoid placing turbines in habitat known to be occupied by Lesser Prairie Chickens or other species that exhibit extreme avoidance of vertical features and/or structural habitat fragmentation.
- Minimize roads, fences, and other infrastructure.
- Develop a habitat restoration plan for proposed sites that avoids or minimizes negative impacts on vulnerable wildlife while maintaining or enhancing habitat values for other species.
- Post-development mortality studies should be a part of any site development plan.

**Public input:** No specific procedures identified.

**Relationships to other important energy policies or siting and zoning decisions:** None identified.

**Contacts:**

Rachel Jankowitz, Habitat Specialist  
Conservation Services Division  
NM Dept of Game & Fish  
rachel.jankowitz@state.nm.us

Jeremy Lewis  
New Mexico Wind Energy Working Group  
(505) 476-3323  
jeremy.lewis@state.nm.us
State Wind Siting and Zoning Survey

Michael McDiarmid
New Mexico Energy
Minerals and Natural Resources Department -- Wind Contact
(505) 476-3319
Michael.McDiarmid@state.nm.us

Citations and links:


Data collected by Marley Ward, 13 Jul 2011.
Reviewed by Rachel Jankowitz, 8 Nov 2011.
State: New York

Wind sitting basics: Projects with a nameplate capacity of 25 MW or more require a Certificate of Public Convenience and Necessity from the Public Service Commission. Wind energy projects may require specific approvals from state or federal agencies, for example wetland or stream disturbance permits from the Department of Environmental Conservation (DEC) or U.S. Army Corps of Engineers (USACE). Before local and State agencies can issue these approvals, an environmental review must be conducted according to the State Environmental Quality Review Act (SEQRA).


Approvals needed: The pre-application process involves submission of an application to the siting board, which includes five state agency officials and two ad hoc members from the community. Depending on location and environmental impact, required permits could include:

1. Construction stormwater permit
2. Coastal erosion control permit
3. Freshwater wetland permit
4. Protection of waters permit
5. Tidal wetlands permit
6. Endangered and threatened species take permit

The first step in the approval process is initiating the SEQRA review, where a local agency is typically the Lead Agency. If at least one potential adverse environmental impact is identified, depending on the type and amount of impact, an Environmental Impact Statement (EIS) could be required. After completion of the SEQRA process, which sometimes includes a public comment period, all involved agencies make decisions, based on each agency’s jurisdiction, to approve or deny the project. SEQRA publishes its procedures (www.riverkeeper.org/wp-content/uploads/2009/06/A_Citizens_Guid-1.pdf).

The Department of Environmental Conservation has issued guidelines for pre- and post-construction bird and bat monitoring (www.dec.ny.gov/energy/40966.html). Prior to construction, at least one year of monitoring is encouraged, longer if findings indicate that more study is needed. Post-construction monitoring is typically done for a minimum of two years at each project, longer if findings indicate that more study is needed or if site-specific situations warrant further observation.

Evaluation criteria: The following criteria are from the Model Ordinance developed by the New York State Research and Development Authority (NYSERDA; http://nyserda.ny.gov/):

- Controls and brakes: “All wind turbines shall have an automatic braking, governing or feathering system.”
- Climb prevention and locks: “…a fence six feet high with a locking portal shall be placed around the facility’s tower base or the tower climbing apparatus shall be limited to no lower than 12 feet from the ground, or the facility’s tower may be mounted on a roof top.”
- Decommissioning: “Any wind energy system found to be unsafe… shall be repaired…or removed within six months. If any wind energy system is not operated for a continuous period of 12 months, the Town will notify the landowner.”
- Environmental: “Wind turbines shall be set back at least 2,500 feet from Important Bird Areas… and at least 1,500 feet from State-identified wetlands.”
Interference with communications devices: “The applicant shall minimize or mitigate any interference with electromagnetic communications.”

Liability insurance: “Prior to issuance of a building permit, the applicant shall provide the town proof of… insurance.”

Lighting: “Towers shall be equipped with air traffic warning lights and shall have prominent markings on the rotor blade tips of an international orange color where the total height of the tower exceeds 175 feet.”

Minimum property setbacks: “The minimum setback distance… shall be equal to no less than 1.5 times the sum of proposed structure height plus the rotor radius.”

Power lines: “All wiring between wind turbines and the wind energy facility substation shall be underground.”

Protection of public roads: “…if new roads are needed, minimize the amount of land used for new roads and locate them so as to minimize adverse environmental impacts.”

Sound levels: “Individual wind turbine towers shall be located so that the level of noise produced by wind turbine operation shall not exceed 55 dBA.”

Substation: “…if new substations are needed, minimize the number of new substations.”

Visual appearance of wind turbines and related infrastructure: “Brand names or advertising… shall not be visible from any public access” and “colors and surface treatment… shall minimize visual disruption. … Where wind characteristics permit, wind towers shall be set back from the tops of visually prominent ridgelines.”

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: The state of New York has a renewable portfolio standard (RPS) of 24% percent by 2013. “Main tier” sources, including wind power, must provide at least 93% of this standard.

Pending issues: On 22 Jun 2011, the New York State Assembly passed the State Power Act of 2011, which will create a centralized and streamlined process for wind facility siting for projects over 25 MW. The new siting board will be composed of executives at various state agencies.

Contacts:

Brianna Gary, Avian Ecologist
NYSDEC
625 Broadway
Albany, NY 12233-4756
(518) 402-8858
bmgary@gw.dec.state.ny.us

Citations and links:


State Wind Siting and Zoning Survey

State: North Carolina

Wind siting basics: Wind siting is done at the local level of government.

History of siting authority: North Carolina General Statutes, Chapter 62 (1963) (www.ncga.state.nc.us/enactedlegislation/statutes/html/bychapter/chapter_62.html)


North Carolina is a Home Rule state.

Approvals needed: The following agencies should be contacted:

1. North Carolina Department of Environment
2. North Carolina Department of Natural Resources
3. U.S. Army Corps of Engineers for projects in or around streams, wetlands, or other waters
4. County government

The developer must obtain a Certificate of Public Convenience and Necessity from the NCUC. If the project is 300 MW or more, the applicant must submit a summary at least 120 days before filing an application.

Evaluation criteria: Criteria from the Watuaga County ordinance (2006) include:

1. Decommissioning
2. Demographics of surrounding area
3. Location, topography and wetland assessments
4. Maintenance
5. Noise
6. Public health and safety
7. Tourism and community benefits
8. Visual impacts, with a special emphasis on the Blue Ridge Parkway viewsed.

Public input: Within ten days of filing an application, the applicant must provide at least three public notifications through the local newspaper to all residents in the county and municipality that will be affected by the facility. A project summary must also be forwarded to the North Carolina State Environmental Review Clearinghouse (www.doa.state.nc.us/clearing/).

Relationships to other important energy policies or siting and zoning decisions: North Carolina’s renewable portfolio standard (RPS) requires 12.5% of 2020 electricity sales to come from renewable sources. Each utility shall file compliance reports in 2012, 2013, 2014, 2015, 2018, and 2021, detailing the previous year’s electricity sales. (Database of State Incentives for Renewables & Efficiency, 2011).

Pending issues: The Desert Wind Energy Project, North Carolina’s first utility-scale wind facility, a 300 MW wind facility in the counties of Pasquotank and Perquimans, has received approval from the North Carolina Utilities Commission. Electricity generation is anticipated to begin by the end of 2012.
Contacts:

Sam Watson
North Carolina Utilities Commission
430 N. Salisbury Street
Raleigh, NC 27611
Phone: (919) 715-7057
www.ncuc.commerce.state.nc.us
swatson@ncuc.net

Citations and links:


Data collected by Francis Motycka 6, 11, 12 Jul, 3 Aug 2011.
State Wind Siting and Zoning Survey

State: North Dakota

Wind sitting basics: The North Dakota Public Service Commission (PSC) regulates the siting of wind facilities greater than 0.5 MW ([www.legis.nd.gov/cencode/t49c22.pdf](http://www.legis.nd.gov/cencode/t49c22.pdf)). Smaller facilities are regulated at the local level (by either county or township board).

History of siting authority: The Energy Conversion and Transmission Facility Siting General Provisions were amended in 1979, and again in 1982, 2008, and most recently in 2011. Passage of Senate Bill 2196 (Sixty Second Legislative Assembly of North Dakota, 2011) closed what one state senator referred to as a “loophole” that allowed wind developers to avoid the state siting provisions by breaking up larger wind projects into smaller ones simply to keep under the minimum capacity threshold (“ND PSC may get broader wind farm siting authority,” 2011). Prior to this amendment, North Dakota PSC had authority to review energy conversion facilities for projects over 60 MW. The 2011 amendments lower the limit for wind generators to 0.5 MW and all other generators to 50 MW.

Approvals needed: For any wind project greater than 0.5 MW, applicants must obtain a Certificate of Site Compatibility from the North Dakota Public Service Commission. The Commission works in concert with as many as 21 state agencies in determining whether to issue a Certificate.

The North Dakota PSC outlines a comprehensive list of procedures and required certificates and permits. These include:

   - Advisory Committees
   - Public Hearings
2. Utility Reporting Requirements
3. Letter of Intent
4. Certificate of Site or Corridor Compatibility
5. Transmission Facility Permit
6. Waiver of Procedures and Time Schedules
7. Criteria
8. Continuing Suitability of Certificate or Permit

The timetable for application review is undetermined, dependent upon completion of all requirements.

Evaluation criteria: Criteria for evaluating energy conversion facility siting decisions include:

1. Exclusion zones
   - national parks, forests, etc.
   - state parks, forests, etc.
   - irrigated lands

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5 The list of 21 state agencies required to receive notice of applications for Energy Conversion Facilities and Transmission Facilities is included in § 69-06-01-05. These include the North Dakota Departments of Agriculture, Health, Human Services, Labor, Career and Technical Education, and the Aeronautics Commission, Attorney General, Economic Development Commission Energy Development Impact Office, Game and Fish Department, Geological Survey, Governor, Highway Department, State Historical Society of North Dakota, Indian Affairs Commission, Job Service of North Dakota, Land Development, Parks and Recreation Department, Division of Community Services-Department of Commerce, Soil Conservation Committee, and State Water Commission.
- areas important to the life-cycle of endangered species

(2) Avoidance areas
- geologically unstable areas
- historically significant areas
- woodlands and wetlands

(3) Selection criterion – evaluation of impacts on:
- Agriculture
- Law enforcement
- School systems and educational programs
- Governmental services and education programs
- General and mental health care facilities
- Recreational programs and facilities
- Transportation facilities and networks
- Retail service facilities
- Utility services
- Local institutions
- Noise-sensitive land uses
- Rural residences and businesses
- Aquifers
- Human health and safety
- Animal health and safety
- Plant life
- Temporary and permanent housing
- Temporary and permanent skilled and unskilled labor

**Public input:** General hearings are held prior to adopting or modifying the criteria, or suspending a certificate or permit. Application hearings are held for a certificate or permit.

**Relationships to other important energy policies or siting and zoning decisions:** North Dakota has a Renewable Portfolio Standard of 10% by 2015. North Dakota already has over 1,400 MW of installed wind capacity (Wind Powering America, 2011).

**Contacts:**

Christopher Marohl
Public Utility Analyst
ND Public Service Commission
camarohl@nd.gov

John Schumacher
Resource Biologist
ND Game & Fish Dept
(701) 328-6321
jdschumacher@nd.gov
Citations and links:


Data gathered by Kai Goldynia, 23 Jul 2011.
Reviewed by Christopher Marohl, 31 Oct 2011.
**State:** Ohio

**Wind siting basics:** The Ohio Power Siting Board (OPSB) has regulatory jurisdiction for the siting of all wind projects in Ohio with a generating capacity of at least 5 megawatts (MWs). For wind projects less than 5 MW, the local zoning requirements would apply.

**History of siting authority:** Previously, the OPSB had jurisdiction for wind farms with a capacity of at least 50 megawatts; however, as of 2008, the legislature extended the Board’s jurisdiction to also include economically significant wind farms, defined as having generating capacities between 5 and 50 MWs ([http://codes.ohio.gov/orc/4906.20](http://codes.ohio.gov/orc/4906.20)).

**Approvals needed:** Developers who wish to site wind facilities designed for or capable of generating five or more megawatts must first apply for and obtain a certificate of environmental compatibility and public need from the OPSB.

Permits required for construction could include at least:

- National Pollutant Discharge Elimination System (NPDES) Permit – Construction that disturbs 1 acre or more requires a stormwater-discharge permit from the Ohio Environmental Protection Agency (EPA).
- Water Quality Certificate – Construction that disturbs lakes, rivers, streams, and wetlands requires a water-quality certificate from the Ohio EPA.
- Shoreline – Shore structure construction requires a permit from the Ohio Department of Natural Resources. (Great Lakes Commission, 2009).

**Evaluation criteria:** For the complete Basis for Decision Granting or Denying Certificate (Ohio Revised Code 4906.10), see [http://codes.ohio.gov/orc/4906.10](http://codes.ohio.gov/orc/4906.10). The OPSB criteria include:

- The need for the facility if the facility is an electric transmission line…;
- The probable environmental impact of the proposed facility;
- Whether the facility represents the minimum adverse environmental impact…;
- In the case of electric transmission lines, that the facility is consistent with regional plans for expansion of the electric power grid of the electric systems serving Ohio…
- That the facility will comply with all air and water pollution control and solid waste disposal laws and regulations;
- That the facility will serve the public interest, convenience, and necessity;
- The facility’s impact on the viability as agricultural land of any land in an existing agricultural district; and
- That the facility incorporates maximum feasible water conservation practices as determined by the Board…. (Ohio Power Siting Board, 2010).

**Public input:** The Ohio power siting process includes several opportunities for public input, including mandatory public information meetings prior to the filing of an application and public hearings. Members of the public can seek to intervene in the siting proceeding, testify at public hearings without intervening, and submit letters that are considered by the Board in making its decisions. ([www.puco.ohio.gov/emplibrary/files/OPSB/Presentations_Manuals/OPSBbrochure2010.pdf](http://www.puco.ohio.gov/emplibrary/files/OPSB/Presentations_Manuals/OPSBbrochure2010.pdf)).
State Wind Siting and Zoning Survey

Relationships to other important energy policies or siting and zoning decisions: Ohio has an alternative energy resource standard of 25 percent by 2025; at least half must come from renewable sources, including a specific in-state requirement (Database of State Incentives for Renewables & Efficiency).

Contacts:

Christina O’Keeffe
Ohio Wind Working Group
(614) 466-8396
Christina.Okeeffe@development.ohio.gov

Jennifer Norris, Wind Energy Wildlife Biologist
Ohio Department of Natural Resources
Division of Wildlife
Jennifer.Norris@dnr.state.oh.us

Megan Seymour, Wildlife Biologist
U.S. Fish and Wildlife Service
Reynoldsburg Field Office
megan_seymour@fws.gov

Citations and links:


Ohio Department of Natural Resources. (14 Mar 2008). Ohio Department of Natural Resources Terrestrial Wind Energy Voluntary Cooperation Agreement.
www.dnr.state.oh.us/LinkClick.aspx?fileticket=Gss3B%2BJeczA%3D&tabid=21467.


Data collected by Kai Goldynia, 23 June 2011.
Reviewed by Stuart Siegfried, 8 Nov 2011.
State: Oklahoma

Wind sitting basics: Responsibility for wind sitting is entirely at the local level of government. Wind power projects can go through a voluntary review by the Oklahoma Corporation Commission.


Approvals needed: Applicants must adhere to the requirements mandated by the local jurisdiction.

The Oklahoma Wind Energy Development Act regulates decommissioning, requires wind farm operators to provide prompt statements regarding royalty payments to land-owners, and requires commercial liability insurance with the landowner insured (Oklahoma Statutes Title 17, §160.14 et seq.)

Evaluation criteria: None identified.

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: Oklahoma has a renewable energy portfolio standard (RPS) mandating that 15% of energy capacity will come from renewable sources, including wind, by 2015. Each utility files an annual report to the Oklahoma Corporation Commission, including total kilowatt-hours (kWh) and the sources for generation. Oklahoma has no specific provisions for using or trading renewable energy credits (RECs) (Database of State Incentives for Renewables & Efficiency).

Pending issues: The Oklahoma Exploration Rights of 2011 (§52-801 – §52-805 www.oklegislature.gov/osstatuestitle.html) mandates that the exploratory rights of oil and natural gas companies "not be diminished, abrogated or interfered with in any respect by a wind or solar energy agreement except with the prior written consent of the owner of exploration rights, which consent may be granted or withheld for any reason or for no reason."

Contacts:

George Kiser
Oklahoma Corporation Commission
Public Utility Division
2201 N. Lincoln Boulevard
Oklahoma City, OK 73105
(405) 521-6878
www.occ.state.ok.us
g.kiser@occemail.com

Oklahoma Corporation Commission
PO Box 52000
Oklahoma City, OK 73152-2000
(405) 521-2211
www.occeweb.com/index.html
Citations and links:


Data collected by Francis Motycka, 8, 10, 11 Jul 2011.
Reviewed by George Kiser, 16 Dec 2011.
State: Oregon

Wind siting basics: Wind projects smaller than 105 MW are regulated by cities and counties. The Oregon Energy Facility Siting Council (EFSC) regulates larger projects.

History of siting authority: The Energy Facility Siting Council and the Oregon Department of Energy were created in 1975 (Oregon Statutes – Chapter 469, www.leg.state.or.us/ors/469.html).

Approvals needed: For small wind applications, applicants must obtain local land-use permits and electrical (building) permits. For large wind, developers must apply to the EFSC for a site certificate.

Evaluation criteria:

Small Wind

- Turbines must be mounted on towers between 60-100 feet tall, at least 30 feet above obstructions
- Residential wind turbines must range from 500 watts to 10 kilowatts

Large Wind

General Standards

- Noise
- Wetlands
- Water Pollution Control Facility
- Water Rights

Specific Standards

- Organizational Expertise: helps ensure that the applicant has the abilities and resources to successfully build and operate the facility.
- Structural Standard: protects public health and safety, including the safety of facility workers, from seismic hazards.
- Soil Protection
- Protected Areas
- Fish and Wildlife Habitat
- Threatened and Endangered Species
- Scenic Resources
- Historical, Cultural, and Archaeological Resources
- Recreation
- Public Services
- Waste Minimization
- Carbon Dioxide Emissions
- A "one-stop" process in which the Council determines compliance with specific standards of the Council and other state and local permitting agencies.
- Appeals requiring judicial review go directly to the Oregon Supreme Court.

Public input: For large wind, public comment periods take place during the early phase of the process and are followed by formal contested case proceedings.

Relationship to other important energy policies or siting and zoning decisions: Oregon’s Renewable Portfolio Standard directs utilities to reach 25% of retail electricity needs with qualified renewable resources by 2025.
Pending issues: A major issue for Oregon large wind generation arises due to competition with hydroelectric power for limited transmission capacity. The Bonneville Power Authority (BPA) has sometimes issued curtailment orders for wind farms along the Columbia River (Laskow, 2011). On 7 Dec 2011, the Federal Energy Regulatory Commission (FERC) ruled that curtailment of wind power is discriminatory (Ranken, 2011).

Contacts:

Andy Ginsburg, Air Quality Administrator
Oregon Department of Environmental Quality
811 SW Sixth Ave
Portland, OR 97204
(503) 229-5397
ginsburg.andy@deq.state.or.us

Diana Enright, Assistant Director
Renewable Energy Division
Oregon Department of Energy
625 Marion St. NE
Salem, OR 97301-3737
diana.enright@state.or.us

Tom Stoops, Council Secretary
Energy Facility Siting Council
Oregon Department of Energy
625 Marion St. NE
Salem, OR 97301-3737
Tom.stoops@state.or.us

Citations and links:


Data collected by Kai Goldynia, 10 Jul 2011.
State: Pennsylvania

Wind sitting basics: Siting responsibility lies at the municipal level of government. A model ordinance was created in 2006; however, many local municipalities have developed their own guidelines and ordinances (Pennsylvania Department of Environmental Protection, 2006).


Approvals needed: Within 30 days of a permit application, the municipality will determine whether or not the application is complete. Once the application is determined to be complete, the municipality will schedule a public hearing, and, within 120 days or 45 days after any hearing is completed, whichever is later, the municipality will decide to issue or deny the permit application (Pennsylvania Department of Environmental Protection, 2006).

A cooperative agreement with the Pennsylvania Game Commission addressing bat, bird, and wildlife issues is voluntary. Specific wildlife surveys can be required, depending on projected impacts. According to the Wind Energy Voluntary Cooperation Agreement with the Pennsylvania Game Commission, the developer must notify the PGC 14 months prior to construction. Within 45 days of the notification, the PGC will communicate its findings on the potential impact of the wind development site on wildlife and habitat.

For erosion and sediment control, the Pennsylvania Department of Environmental Protection (DEP) requires a general or individual NPDES Permit for Storm Water Discharges Associated with Construction Activities. For water obstruction and encroachment and wetlands, developers must obtain a separate DEP permit (Commonwealth of Pennsylvania). In addition, before submitting to the DEP, the applicant must complete an online Pennsylvania Natural Diversity Inventory (PNDI) Environmental Review (Commonwealth of Pennsylvania Office of Energy and Technology Development, Department of Environmental Protection).

Evaluation criteria: No firm criteria identified. The Model Ordinance includes:

- Controls and brakes: “All Wind Energy Facilities shall be equipped with a redundant braking system.”
- Climb prevention and locks: “Wind Turbines shall not be climbable up to fifteen (15) feet above ground surface,” and “All access doors to Wind Turbines and electrical equipment shall be locked or fenced, as appropriate.”
- Decommissioning: “The Facility Owner and Operator shall… complete decommissioning of the Wind Energy Facility, or individual Wind Turbines, within (12) twelve months after the end of the useful life of the Facility or individual Wind Turbines”
- Dispute resolution: “The Facility Owner and Operator shall maintain a phone number and identify a responsible person for the public to contact with inquiries and complaints.”
- Interference with communications devices: “The Applicant shall make reasonable efforts to avoid any disruption or loss of radio, telephone, television or similar signals, and shall mitigate any harm caused by the Wind Energy Facility.”
- Liability insurance: “There shall be maintained a current general liability policy.”
Minimum property setbacks: “Wind Turbines shall be set back from the nearest Occupied Building a distance…1.1 times the Turbine Height. For non-participating landowners, “Wind Turbines shall be set back from the nearest Occupied Building located on a Non-participating Landowner’s property a distance of not less than five (5) times the Hub Height.”

Power lines: “On-site transmission and power lines between Wind Turbines shall… be placed underground.”

Protection of public roads: “Any road damage caused by the applicant or its contractors shall be promptly repaired at the Applicant’s expense.”

Shadow flicker: There are no specific standards in the Model Ordinance.

Sound levels: “Audible sound from a Wind Energy Facility shall not exceed fifty (55) dBA.”

Visual appearance of wind turbines and related infrastructure: “Wind Turbines shall be a non-obtrusive color…” and “Wind Turbines shall not display advertising.”

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: Pennsylvania’s Advanced Energy Portfolio Standard (AEPS) mandates that 18% of electricity sold by each electric distribution company (EDC) and electric generation supplier (EGS) within Pennsylvania must be generated from alternative energy sources by the year 2020. The standard includes a mandate for 8% of the energy sources to come from “Tier 1” sources, which includes wind, among other sources.

Contacts:

Thurman Brendlinger
Clean Air Council
135 South 19th St. Suite 300
Philadelphia, PA 19103
(215) 567-4004 x104
brendlinger@cleanair.org

Kerry Campbell
Office of Pollution Prevention and Compliance Assistance
Pennsylvania Department of Environmental Protection
Harrisburg, PA 17105
(717) 772.5985
kcampbell@state.pa.us

Scott Gebhardt, Analyst
Pennsylvania Public Utility Commission
P.O. Box 3265
Harrisburg, PA 17105-3265
(717) 425-7584
www.puc.state.pa.us/
ra-aeps@state.pa.us
Citations and links:


State Wind Siting and Zoning Survey

State: Rhode Island

Wind siting basics: For projects 40 MW and over, the Rhode Island Energy Facilities Siting Board is in charge. For projects under 40 MW, local governments have siting authority.


The Comprehensive Energy Conservation Efficiency and Affordability Act of 2006 gives the Rhode Island Division of Planning the authority to establish standards and guidelines for locating renewable energy facilities (www.rilin.state.ri.us/BillText/BillText06/SenateText06/S2903Baa.pdf).

Approvals needed: For facilities over 40 MW, the Siting Board collaborates with various state and local agencies to ensure that the applicant is complying with state and local regulations and then issues a one-stop permit. The only on-shore wind facilities in Rhode Island, as well as any that have been proposed to date, are far under 40 MWs (Gonsalves, Paul, Rhode Island Division of Planning, personal communication, 8 Aug 2011). Therefore, applicants are permitted by the local government. In this case, the applicant would at least need approval from the local Planning Commission and a special use permit from the zoning board.

Evaluation Criteria:

A report by the Rhode Island Department of Environmental Management (DEM) proposed the following guidelines for siting wind turbines on state lands:

- Distance from nearest property line: 1.5 times hub height + rotor radius
- Distance from nearest structure: 1.5 times hub height + rotor radius
- Distance from roads: 1.5 times hub height + rotor radius
- Distance to protect from icing: 820 feet
- Public safety distance: 1.5 times hub height + rotor radius
- Noise: Project must not exceed 35 DBA in the evening, 45 DBA in the daytime in residential areas. Cannot increase background tonal sound by more than 3 DB.

The Rhode Island Division of Planning is currently in the process of developing wind siting guidelines for the municipalities, and possibly a model ordinance. The guidelines should be released next month.


Public input: None identified. Municipalities can hold public hearings.

Relationships to other important energy policies or siting and zoning decisions: Rhode Island has an RPS of 16% by 2019. A separate and distinct standard enacted in June 2009 (Long-Term Contracting Standard for Renewable Energy) requires electric distribution companies to solicit proposals and enter into long-term contracts for capacity, energy and attributes from new renewable energy facilities. (DSIRE, 10 Aug 2011).

Pending issues: Over 95% of wind energy potential in Rhode Island is located offshore. As such, the Rhode Island Coastal Resources Management Council has developed the Ocean Special Area Management Plan (Ocean SAMP), in an effort to encourage renewable energy development offshore. Link to the Ocean SAMP: http://seagrant.gso.uri.edu/oceansamp/pdf/samp_approved/800_renewable_OCRMchanges_5.4_Clean.pdf
Several towns currently in the process of permitting a wind turbine have placed a moratorium on permitting until the RI Division of Planning releases its new wind siting guidelines.

Contacts:

Patrick McCarthy, Administrator of Energy Programs
State of Rhode Island
Office of Energy Resources
One Capitol Hill
Providence, RI 02908
(401) 574-9100
Patrick.McCarthy@energy.ri.gov

Paul Gonsalves
Rhode Island Division of Planning
Senior Planner
401-222-1756
Paul.gonsalves@doa.ri.gov

Citations and links:


Data collected by Lauren Teixeira, 28 Jul 2011.
State Wind Siting and Zoning Survey

State Name: South Carolina

Wind siting basics: The Utility Facility Siting and Environmental Protection Act (S.C. Code Ann. § 58-33-10, www.scstatehouse.gov/code/t58c033.php) governs siting of major utility facilities. Currently, wind power projects less than 75 MW are not regulated at either the state or local level of government. Electric suppliers regulated by the Public Service Commission (PSC) seeking to build an electric generating plant of 75 MW or greater must obtain a Certificate of Public Convenience and Necessity (CPCN), issued by the PSC. The application includes a description of the facility, its location, a statement explaining the need for the facility, and environmental impact studies.

The South Carolina Office of Regulatory Staff (ORS) has sole responsibility for the inspection, auditing, and examination of public utilities, and represents the public interest in regulation of the major utility industries (Act 175 of 2004, www.scstatehouse.gov/code/t58c003.php).

History of siting authority: None identified.

Approvals needed: No state level approval is needed, unless the facility is covered under the Utility Facility Siting and Environmental Protection Act or involves lands otherwise subject to regulation, such as wetlands.

Evaluation criteria: None identified.

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: South Carolina currently has no Renewable Portfolio Standard. The potential for use of offshore wind as a key renewable technology is currently a subject of discussion in South Carolina.

Pending issues: South Carolina Act 318 of 2008 (www.scstatehouse.gov/code/t48c052.php) established the Wind Production Farms Feasibility Study Committee to evaluate wind power feasibility. The study results were issued in a 1 Jan 2010 report to the Governor and South Carolina General Assembly (http://energy.sc.gov/index.aspx?m=6&t=123).

The Regulatory Task Force for Coastal Clean Energy was established as an objective of a 2008 grant from the U.S. Department of Energy, which has the goal of identifying and overcoming existing barriers for coastal clean energy development for wind, wave and tidal energy projects in South Carolina (http://energy.sc.gov/index.aspx?m=6&t=85&h=904).

Contacts:

South Carolina Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC 29201
www.regulatorystaff.sc.gov/

Citations and Links:


State Wind Siting and Zoning Survey

**State:** South Dakota

**Wind siting basics:** A permit from the South Dakota Public Utilities Commission (PUC) is required for electric generating facilities with a capacity over 100 MW.


**History of siting authority:** Siting authority created by SD Legislature in SDCL 49-41B (1977) ([http://legis.state.sd.us/statutes/DisplayStatute.aspx?Type=Statute&Statute=49-41B-1](http://legis.state.sd.us/statutes/DisplayStatute.aspx?Type=Statute&Statute=49-41B-1)).


**Approvals needed:** In addition to the permit from the PUC, approvals are required from the following agencies:

- South Dakota Department of Transportation, [www.sddot.com/](http://www.sddot.com/) – Need is dependent on whether the site will utilize state right-of-way.
- Local Government (County/City Commission) – Building permits typically required regardless of project size.

The time frame for obtaining a permit from the PUC is (Binder, 2009):

- Notice of intent filed six months prior to Application for Permit. (Notice of intent process only applies to non-wind energy conversion facilities over 100 MW.)
- Application for Permit filed.
- Public Hearing within 60 Days.
- Decision within six months of receipt of Application (one year for non-wind energy conversion facilities).


“The Public Utilities Commission shall also hear and receive evidence presented by any state department, agency, or units of local government relative to the environmental, social, and economic conditions and projected changes therein” ([http://legis.state.sd.us/statutes/DisplayStatute.aspx?Type=Statute&Statute=49-41B-19](http://legis.state.sd.us/statutes/DisplayStatute.aspx?Type=Statute&Statute=49-41B-19)).
Public input: Per SDCL 49-41B-16, a public hearing shall be held as close as practicable to the proposed facility’s location. Timing requirements usually schedule this about 60 days after the application is filed (http://legis.state.sd.us/statutes/DisplayStatute.aspx?Type=Statute&Statute=49-41B-16).

Relationships to other important energy policies or siting and zoning decisions: None identified.

Contacts:

Brian Rounds, Staff Analyst
S.D. Public Utilities Commission
Capitol Building, 1st Floor
500 East Capitol Avenue
Pierre, SD 57501
(605) 773-3201
http://puc.sd.gov
brian.rounds@state.sd.us

Citations and links:


Reviewed by Brian Rounds, 1 Dec 2011.
State Wind Siting and Zoning Survey

**State:** Tennessee

**Wind siting basics:** Wind siting is done at the local level of government. The applicant could apply to the Tennessee Department of Economic and Community Development (TECD) for energy facilities that will produce over 50 MW.

**History of siting authority:** None identified.

**Approvals needed:** TECD will find information regarding economic need and transmission. If the application meets TECD approval, it is then forwarded to the Tennessee Department of Environment & Conservation for environmental permitting. Tennessee is a Home Rule state.

**Evaluation criteria:** None identified.

**Public input:** No specific procedures identified.

**Relationships to other important energy policies or siting and zoning decisions:** None identified.

**Contacts:**

Katie Stokes  
Southern Alliance for Clean Energy  
(865) 637-6055 ext. 22  
Katie@cleanenergy.org

Vivian Michael-Wilhoite, Outreach Coordinator  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243  
vivian.michael-wilhoite@tn.gov

**Citations and links:**


Data collected by Francis Motycka, 6, 11 Jul 2011.
State: Texas

Wind sitting basics: All siting authority is delegated to the local governments. If asked, the Texas Parks and Wildlife Department will review projects for compliance with wildlife protection guidelines. The Texas PUC has some indirect authority (see discussion of transmission below).


Approvals needed: No approval is needed from anyone, except leases with landowners; however, wind developments are subject to federal and state laws protecting endangered species. Applicants can request a review from the Texas Parks and Wildlife Department. The Department’s findings are not binding (Boydston, 2011). Applicants can ask the county comptroller for a property tax abatement, based on the jobs and general economic benefits expected. The county board can deny the property tax abatement if there is public opposition.

Most projects take about 18 months to begin commercial operation, and few projects take longer than two years (Boydston, Kathy, Texas Parks and Wildlife Department, personal communication, 24 Jun 2011).

Evaluation criteria: Although there are no officially required criteria, developers often conduct pre-construction wildlife surveys.

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: Competitive Renewable Energy Zone (CREZ) legislation passed in 2007. The Texas PUC designates CREZs, which allow construction of transmission lines to serve the zone, prior to the commercial operation of new renewable energy generators. In this way, the Texas PUC has indirect siting authority.

Contacts:

Kathy Boydston
Texas Parks and Wildlife Department
(512) 389-4638
kathy.boydston@tpwd.state.tx.us

Thomas Gleeson, Project Manager
Public Utility Commission of Texas
William B. Travis Building
1701 N. Congress Avenue
Austin, TX 78701
thomas.gleeson@puc.state.tx.us

Lindsey Hughes, Associate Director
Wind coalition
(512) 651-0291
Lindsey@WindCoalition.org
Citations and links:


State: Utah

Wind siting basics: Wind siting is done at the local level of government. Utah does not have a state agency with sole authority over electric plant siting. The developer must contact the various agencies that could have responsibility. Those agencies will determine what approvals are required (Stemler, 2007). Utah is a Home Rule state.


Approvals needed: A Certificate of Public Convenience and Necessity from the Utah Public Service Commission is required for new generation facilities. Developers should also contact the Utah Division of Public Utilities, the Utah Department of Natural Resources, and the Utah Division of Wildlife.

If the project includes facilities on or near lands that are under the jurisdiction of the federal Bureau of Land Management (BLM), an application must be submitted to the BLM. (United States Department of the Interior, Bureau of Land Management, 2008).

Evaluation criteria: Utah’s Model Wind Ordinance (2009) lists:

- Climb prevention and locks
- Decommissioning
- Height and blade height (clearance above the ground)
- Lighting
- Maintenance
- Minimum property setbacks (110% of the height of the system from all inhabited structures, overhead utility lines, and public roads or public right-of-ways; § 4.1.2)
- Sound levels (compliance with the existing noise or sound ordinance; § 4.1.9)
- Visual appearance of wind turbines and related infrastructure

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: The Energy Resource and Carbon Emissions Reduction Initiative was passed into law in 2008, with a goal of 20% electricity generated from renewable sources by 2025. The first compliance year will be 2025.
Pending issues: On 23 Mar 2011 the Utah Association of Counties and the Uintah County Commission filed a lawsuit (United States Department of the Interior) against Ken Salazar, Secretary of the Interior, et al., in response to Secretarial Order 3310, declaring 385,000 acres of Uintah County land wild lands territory (The Secretary of the Interior, 2010). The declaration will expand the power of the Bureau of Land Management in control of public land and would place additional restrictions on the potential for wind development.

Contacts:

Chris Tallackson
Office of Energy Development
195 N 1950 West, 2nd Floor
Salt Lake City, UT 84116
Phone: (801) 536-4280
http://geology.utah.gov/sep/
ctallackson@utah.gov

Denise Brems
Utah State Energy Program Parner Coordinator
Utah Geological Survey
dbeaudoin@Utah.gov

Citations and links:


The Secretary of the Interior. (22 Dec 2010). Secretarial Order 3310.


United States District Court District of Utah, Central Division. (22 Mar 2011). Plaintiff’s First Amended and Supplemental Complaint for Declaratory, Mandatory and Injunctive Relief.


Data collected by Francis Motycka, 6, 11 Jul 2011; Deborah Luyo, 21 Oct 2011.
State Wind Siting and Zoning Survey

State Name: Vermont

Wind siting basics: The Vermont Public Service Board (PSB) issues a Certificate of Public Good (CPG) for all wind facilities, with the exception of those operated solely for the customer’s on-site consumption. Net metering systems do require a CPG. The Vermont Department of Public Service (DPS), which represents ratepayers in PSB proceedings, and the Vermont Agency of Natural Resources (ANR) are automatic parties to any proceeding.

History of siting authority:
30 V.S.A. § 248 www.leg.state.vt.us/statutes/fullsection.cfm?Title=30&Chapter=005&Section=00248
PSB Rule 5.400

Approvals needed: The PSB regulates all grid-connected wind developments and must find that the facility will promote the general good of the state before it can issue a CPG. In addition, the Vermont Agency of Natural Resources (ANR) has independent jurisdiction over certain permits that may be required by the facility; these may include permits involving the facility’s impact on wetlands and water quality.

Local permits are not required; however, the PSB is required to give “due consideration” to the recommendations of municipal and regional planning organizations as well as the recommendations of municipal legislative bodies.

Evaluation criteria: Pursuant to statute, the PSB must find that the facility meets certain criteria. These include whether the project will:

1. adversely affect system stability and reliability;
2. provide an economic benefit to the state; and
3. have an undue adverse impact on natural resources and aesthetics.

In analyzing the project’s impacts on natural resources, developers often provide information regarding:

1. Radar and acoustical surveys to develop an understanding of bird and bat activity and migration characteristics
2. Evaluation of the presence of rare, threatened, and endangered species and associated habitat(s)
3. Analysis of suitable habitat for endangered bat species
4. Resident avian and breeding survey
5. Necessary wildlife habitat surveys
6. Delineation of habitats that may be especially vulnerable

ANR requests that developers follow specific voluntary procedures in accordance with ANR guidelines, including:

1. Completion of pre-construction survey
2. Site development recommendations
3. Consultation with wildlife agency, USFWS
4. Mitigation requirements
5. Post-construction/operational surveys
6. Decommissioning procedures
Public Input: With the exception of net metered projects, and projects of limited size and scope, all PSB siting proceedings involve a public hearing in the county in which the facility is located. In addition, the deadline for intervention requests is typically after the public hearing in order to allow members of the public that meet the PSB’s standards for intervention to participate in the proceeding.

Relationships to other important energy policies or siting and zoning decisions: Vermont has a statewide voluntary renewable goal of 20% by 2017. 30 V.S.A. § 8005(d)(2).


Contacts:

Jeannine McCrumb  
Vermont Agency of Natural Resources  
(802) 241-3691  
jeannine.mccrumb@state.vt.us

Ed McNamara  
Vermont Public Service Board  
112 State Street, Drawer 20  
Montpelier, VT 05620-2701  
(802) 828-2358  
http://psb.vermont.gov/  
ed.mcnamara@state.vt.us

Citations and Links:


Data collected by Kai Goldynia, 6 Aug 2011.  
Reviewed by Ed McNamara, 24 Jan 2012.
State: Virginia

Wind sitting basics: Siting for renewable energy projects is conducted under the authority of local government. The permitting program for construction and operation of renewable energy projects is administered at the state level by the Virginia Department of Environment Quality (DEQ), which explicitly considers the impacts of the project on natural resources (in particular, on wildlife and historical resources).

The Virginia Department of Environmental Quality permits “small renewable energy projects” up to 100 MW (https://leg1.state.va.us/cgi-bin/legp504.exe?091+ful+CHAP0808). The State Corporation Commission (SCC) has siting authority for energy facilities over 100 MW, constructed by rate-regulated utilities (1999, as amended) (https://leg1.state.va.us/cgi-bin/legp504.exe?000+cod+56-580).

History of siting authority: Code of Virginia: Chapter 11.1 of Title 10.1, Article 5, sections 10.1-1197.5 through 10.1-1197.11 (https://leg1.state.va.us/cgi-bin/legp504.exe?091+ful+CHAP0808). Previously, authority over wildlife and historic resources resided with the SCC. This authority was transferred to the DEQ in 2009 for “small renewable energy projects.”

Approvals needed: A special use permit or zoning approval comes from the local government. Virginia is a Dillon’s Rule state.

Among the Virginia counties that have enacted wind ordinances are Pulaski County and Rockingham County, which are inland, and Northampton, located on the coast.

Article 26, the Pulaski County Draft Wind Ordinance,
www.pulaskicounty.org/planning/minutes%20and%20agendas/2010/08-10-10%20minutes.pdf

Ordinance Repealing and Re-enacting Certain Designated Definitions Section 17-6 and 17-6.2 of the Code of Ordinances of Rockingham County Virginia,

Draft revised to incorporate Planning Commission Recommendations of August 2, 2011 & Board of Supervisors’ Intended Recommendations of August 18, 2011,

Code of Virginia: Title 10.1, Chapter 11.1, Article 5 (2009), vests authority in the Virginia Department of Environmental Quality for permitting a “small renewable energy project,” defined as having “a rated capacity not exceeding 100 megawatts…”

Mitigation authority, under the DEQ process, is limited to wildlife and historic resources. Specific wildlife considerations include the effects of wind development on threatened and endangered species, bats, coastal avian protection zones, and sea turtle nesting beaches.

Evaluation criteria: As prerequisites to the renewable energy permit-by-rule application to the DEQ, 14 statutory requirements (from https://leg1.state.va.us/cgi-bin/legp504.exe?091+ful+CHAP0808) must be met:

1. A notice of intent…to submit the necessary documentation for a permit by rule for a small renewable energy project;
2. A certification by the [local] governing body[ies] … that the project complies with all applicable land-use ordinances;
3. Copies of all [electric grid] interconnection studies…;
4. A copy of the final interconnection agreement …;
5. A certification… that the maximum generation capacity… does not exceed 100 megawatts;
6. An analysis of potential environmental impacts… on attainment of national ambient air quality standards;
7. Where relevant, an analysis of the beneficial and adverse impacts… on natural resources;
8. If the Department determines that… significant adverse impacts to wildlife or historic resources are likely, the submission of a mitigation plan… including plans to measure the efficacy of mitigation actions;
9. A certification [that the design is] in accordance with all of the standards that are established in the regulations applicable…;
10. An operating plan describing how any standards… will be achieved;
11. A detailed site plan with project location maps…;
12. …all necessary environmental permits;
13. A requirement that the applicant hold a public meeting; and
14. A 30-day public review and comment period….

The process by which DEQ’s wind permit-by-rule regulations were developed involved 22 Regulatory Advisory Panel meetings, 2 public comment periods, 1 public hearing, and 1 public meeting. (http://vwec.cisat.jmu.edu/workshop/Presentations/Wampler%20-%20Navigating%20Wind%20PBR.pdf)

Criteria common to the three county ordinances cited above include:

- Wind turbines must be of a non-obtrusive color
- Wind energy systems cannot display advertising
- Wind energy systems cannot be artificially lit unless required by the FAA
- Audible sound cannot exceed 55-60 decibels
- Setback requirements
- Height restrictions

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: Virginia has a voluntary Renewable Portfolio goal for 15% of electricity to come from renewable energy sources by 2025. Yearly percentage goals are formulated with 2007 as the base year upon which future years are calculated. To help facilitate these goals, the SCC provides an increased rate of return for participating utilities that meet the requirements. Onshore wind production credits are doubled for compliance purposes (www.dsireusa.org/incentives/incentive.cfm?Incentive_Code=VA10R&re=1&ee=1).

Pending issues: A model wind ordinance is under consideration by an informal Local Government Outreach Stakeholder Group, which includes professionals from state and local government, academia, environmental groups, and industry. A suggested model ordinance is expected by year end 2011. (Contact Carol Wampler, Department of Environmental Quality.)

Research issues: The DEQ would like to know more about the impact of wind turbines on bats, avian species, other wildlife, and historic resources. Research is ongoing.
Contacts:

Greg Abbott  
Virginia State Corporation Commission  
Division of Energy Regulation  
1300 East Main Street  
Richmond, VA 23219  
(804) 371-9611  
Greg.Abbott@scc.virginia.gov

Carol Wampler  
Renewable Energy Policy Manager  
Department of Environmental Quality  
629 East Main Street  
Richmond, Virginia 23219  
804-698-4579  
carol.wampler@deq.virginia.gov

Larry Land  
Director of Policy Development  
Virginia Association of Counties  
1207 East Main Street, Suite 300  
Richmond, Virginia 23219-3627  
804-788-6652  
lland@vaco.org

Citations and links:

www.delmarvanow.com/article/20111015/ESN01/110150301.

Virginia Department of Environmental Quality [web page]. Retrieved 26 Jun 2011 from  


Virginia Wind Energy Collaborative [web page]. Retrieved 26 Jun 2011 from  
http://vwec.cisat.jmu.edu/.


Data collected by Francis Motycka, 6 Jun, 3, 12 Jul 2011; Deborah Luyo, 14 Oct 2011.  
Reviewed by Carol Wampler, 18 Nov 2011.
State: Washington

**Wind siting basics:** Review by the Energy Facility Site Evaluation Council (EFSEC) is available for proposed wind power projects, but applicants must “opt in” to EFSEC’s process. Most existing wind projects have been permitted through counties.

**History of siting authority:** Revised Code of Washington (RCW) 80.50.040 (1970, 2001)  

**Approvals needed:** From the EFSEC website:

“The EFSEC certification process was designed to give applicants an opportunity to present their proposals, allow interested parties to express their concerns to the Council, and have the Council to [sic] address issues related to the application.

There are six major steps in the certification process:

I. Application Submittal  
II. Application Review  
III. Initial public hearings  
IV. Environmental impact statement  
V. Adjudicative proceedings and permits review  
VI. Recommendation to the Governor

Each step has specific requirements the applicant and the Council must follow to ensure a comprehensive and balanced review of the project. Many of the steps take place at the same time.”  
([www.efsec.wa.gov/cert.shtml#Certification2](http://www.efsec.wa.gov/cert.shtml#Certification2)).

Applicants who qualify, as determined by the Council, can undergo an expedited process. The Council has four months to evaluate the application to determine whether to grant expedited processing. The Council has an additional two months to forward a recommendation of approval to the governor. This schedule may be modified as mutually agreed to by the applicant and the Council.

**Evaluation criteria:** Criteria used by the Department of Fish and Wildlife include:

1. Baseline and Monitoring Studies: Calls for pre-project assessments of wind power sites with the goal of avoiding and minimizing bird and bat impacts related to wind turbines; information review; habitat mapping; bird and bat surveys, and threatened and endangered species surveys.
2. Minimization of Wildlife Impacts: Outlines the path for avoiding and minimizing potential impacts related to construction methods and sensitive habitat areas.
3. Operational Monitoring: Details the post-construction monitoring recommendations and the role of the Technical Advisory Committee (TAC), which is recommended for the purpose of providing advice to the project owner and the permitting authority. Members of the TAC can include wind project owners and developers, landowners, and representatives from environmental groups, counties, tribes, and state and federal resources agencies.
4. Research-oriented Studies: Offers recommendations and examples for research needs related to wind power development as it relates to wildlife habitats and species.
5. Habitat Types and Mitigation: Provides statewide ecoregional definitions of habitat types throughout Washington State; encourages development into previously disturbed and developed areas and away from undeveloped fish and wildlife habitat; provides ratios for replacement habitat as mitigation for temporary and permanent wind project impacts; adheres to the principle of no loss of habitat functions and values.  
State Wind Siting and Zoning Survey

**Public input:** State regulations provide opportunities for public input at several points during the licensing process.

**Relationships to other important energy and siting/zoning decisions:** EFSEC is statutorily authorized to preempt local land-use/zoning ordinances for the siting of energy projects.

**Contacts:**

Steve Johnson  
Washington Utilities and Transportation Commission  
1300 South Evergreen Park Drive, SW  
P.O. Box 47250  
Olympia, WA 98504-7250  
(360) 664-1346  
[www.utc.wa.gov](http://www.utc.wa.gov)  
sjohnson@utc.wa.gov

Travis Nelson  
Renewable Energy Policy  
Washington Department of Fish & Wildlife  
[Travis.Nelson@dfw.wa.gov](mailto:Travis.Nelson@dfw.wa.gov)

Washington State Department of Commerce  
State Energy Office  
1011 Plum Street SE  
P.O. Box 42525  
Olympia, WA 98504-2525  
(360) 725-3118  
[www.commerce.wa.gov](http://www.commerce.wa.gov)

**Citations and links:**


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Data collected by Marley Ward, 10 Jul 2011.  
Reviewed by Meg O’Leary, 14 Dec 2011.
State: West Virginia

Wind siting basics: The Public Service Commission (PSC) has sole authority of all public utility siting.


Approvals needed: Developers of wind generation that will produce electricity for sale in wholesale markets need a certificate of public convenience and necessity from the PSC (West Virginia Code §24-2-11, www.legis.state.wv.us/WVCODE/ChapterEntire.cfm?chap=24&art=2&section=11#02). West Virginia is a Dillon’s Rule state.

An applicant must give the PSC a 30-day notice before filing an application for the certificate of public convenience and necessity. After an application is filed, the PSC will either issue or deny the certificate within 270 days. If the projected cost is over $50 million, the PSC will issue or deny the certificate within 400 days.

Evaluation criteria: None identified.

Public input: No specific procedures identified.

Relationships to other important energy policies or siting and zoning decisions: West Virginia’s Renewable Portfolio Standard (RPS) mandates that utility companies with more than 30,000 residential consumers must have at least 25% of their energy from alternative and renewable sources by 2025, with no minimum requirement from renewable sources. Alternative energy credits (AEPs) are used for compliance. Each megawatt-hour of renewable energy (wind) is equal to two AEP credits. Utility companies must have submitted their compliance strategies to the West Virginia PSC by 1 Jan 2011, followed by annual compliance reports. The PSC will impose penalties for utilities not in compliance on 1 Jan 2015 (www.dsireusa.org/incentives/incentive.cfm?Incentive_Code=WV05R&re=1&ee=1).

Pending issues: The Cow Knob Wind Farm is a proposed project in Pendleton County. Solaya Energy LLC has requested that Pendleton County create an ordinance to help facilitate wind facility construction (Adams, 2011).

Research issues: The Beech Ridge Wind Farm in Greenbrier County is currently shutting down its turbines at night, from 1 Apr to 15 Nov, because of concerns over potential harm to the Indiana bat, an endangered species. The developer faces a lawsuit on claims that it did not obtain a permit from the U.S. Fish and Wildlife Service when siting this facility (Hammack, 2011).

Contacts:

Patrick Mann
West Virginia Wind Working Group
Bureau of Business and Economic Research
West Virginia University
(304) 599-2641
Patrick.mann@mail.wvu.edu
State Wind Siting and Zoning Survey

Jeff Herholdt
West Virginia Division of Energy
Bldg. 6, Room 553
State Capitol Complex
Charleston, WV 25305-0311
(304) 558-2234
www.energywv.org
jherholdt@energywv.org

Citations and links:


Data collected by Francis Motycka, 6, 11, 12 Jul 2011.
Reviewed by Earl Melton, 10 Oct 2011.
State: Wisconsin

Wind siting basics: Power plants with a capacity of 100 MW or more must have a Certificate of Public Convenience and Necessity (CPCN) from the Public Service Commission of Wisconsin (PSCW) prior to construction. Projects having less than 100 MW capacity may require a Certificate of Authority (CA) from the PSCW.

History of siting authority: In 2009, Wisconsin Act 40 (Wisc. Stat. § 196.378(4g)(b)) directed the PSCW to establish statewide wind energy siting rules (http://psc.wi.gov/renewables/windSitingRules.htm). The new law required the PSCW to appoint a Wind Siting Council, to advise the PSCW in developing its standards (http://psc.wi.gov/renewables/windSitingCouncil.htm). The Act also provided that local government wind siting ordinances could not be more restrictive than the PSCW rules. The Act dictated that the rules were to include:

- setback requirements that provide reasonable protection from any health effects, including health effects from noise and shadow flicker … decommissioning and may include visual appearance, lighting, electrical connections to the power grid, setback distances, maximum audible sound levels, shadow flicker, proper means of measuring noise, interference with radio, telephone, or television signals, or other matters.

(See https://docs.legis.wisconsin.gov/statutes/statutes/196/378/4g/b and https://docs.legis.wisconsin.gov/statutes/statutes/66/IV/0401).

In March 2011, before the Council’s proposed rules could take effect, the state legislature’s Joint Committee for the Review of Administrative Rules suspended the rules indefinitely. (See http://psc.wi.gov/apps35/ERF_view/viewdoc.aspx?docid=145834).

Approvals needed: The PSCW and the Wisconsin Environmental Policy Act require that applicants provide information on at least two sites. The PSCW then prepares an environmental impact statement, in conjunction with the Wisconsin Department of Natural Resources (WDNR), or an environmental assessment.

Developers must submit an engineering plan to the Wisconsin Department of Natural Resources (DNR) at least 60 days prior to filing an application for a CPCN.

Evaluation criteria: None identified.

Pending issues: How and when the legislature will act on the WPSC proposed rules.

Relationships to other important energy and siting and zoning policies: Wisconsin has a wind (and solar) access law, which protects a right to wind access, via local land-use easement, if the land owner installs a wind generator.

To assist counties, towns, and municipalities in interpreting Wisconsin's wind access laws, chiefly Wis. Stat. § 66.0401, the state developed a Model Small Wind Ordinance which suggests appropriate zoning language for wind energy systems of 100 kilowatts (kW) or less. (http://dsireusa.org/incentives/incentive.cfm?Incentive_Code=W116R&re=1&ee=1).
State Wind Siting and Zoning Survey

Contacts:

Scot Cullen, Chief Electric Engineer
Public Service Commission of Wisconsin
610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854
(608) 267-9229
Scot.Cullen@wisconsin.gov

Deborah Erwin
Public Service Commission of Wisconsin
610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854
(608) 266-3905
Deborah.Erwin@wisconsin.gov

Citations and links:


State: Wyoming

Wind siting basics: Under Wyoming law, all wind energy facilities with a capacity greater than 0.5 MW (500 kW) must obtain county permits. Facilities with 30 or more turbines must, in addition, obtain a permit from the Wyoming Industrial Siting Council (part of the state Department of Environmental Quality). Any application for a project that does not meet the statutory definition of a facility can be referred to the Industrial Siting Council, consistent with the requirements of the Industrial Development Information and Siting Act. No county may adopt wind siting laws less stringent than those of the state. If any part of the proposed project is to occupy federal lands, the applicant must also obtain a permit from the federal Bureau of Land Management (BLM).

History of siting authority: Wyoming Statutes 18-5-501 to 18-5-509 are the most relevant (Wyoming Legislature).

Approvals needed: A permit from the Industrial Siting Council may be required for proposed facilities with less than 30 turbines if the county authority finds that a proposed facility poses certain significant environmental or societal risks that the county does not feel qualified to assess.

Procedures for application include:

1. Developer must submit application to the County Board of Commissioners
   Notifications
   • Applicant must have made “reasonable efforts” to provide notice to all owners of land within one mile of the facility and to all cities and towns located within 20 miles of the facility.
   • Applicant must publish a notice of application in a widely circulated newspaper at least 20 days prior to a public hearing.
2. The board will conduct a review to determine whether the application is complete.
3. Within 45 days after completion of the hearing period, the Board shall “make complete findings” and issue its decision granting or denying the application.
4. Any party can file an appeal in district court. The decision issued in the appeal is considered final.
5. If the facility does not automatically fall under the Industrial Siting Council, the County Board may refer the applicant to the Industrial Siting Council for further permitting.

Evaluation Criteria: Environmental approval is part of a collaborative review process in which the Industrial Siting Council asks for input on environmental standards from the Wyoming Fish and Game Department. The Council has the authority to require wildlife mitigation measures.

Various other standards must be met and certified in the application:

Setbacks
• A turbine must be sited at least 110% of its height from any property line “contiguous or adjacent” to the proposed facility, unless the property owner waives the setback distance in writing.
• A turbine must be sited at least 110% of its height from public roads.
• A turbine must be 550% of its height and no fewer than 1000 feet away from “platted subdivisions.”
• A turbine must be 550% of its height and no fewer than 1000 feet away from a residential dwelling.
• A turbine must be at least a half mile from city limits.
Other criteria:

- Must have an emergency management plan.
- Must have a waste management plan (including decommissioning).
- Must conduct a traffic study of any public roadways leading to and away from the proposed facility. (Applicant can be required to enter into “reasonable road use” agreements.)
- There can be no advertising on the facility, with the exception of the applicant’s logo on the nacelle.
- Must have a reclamation and decommissioning plan that indicates the planned life of the wind energy facility.
- Must certify that the landowners have been consulted.
- The decommissioning/reclamation plan must be updated every five years.

Public input: Once the application is determined to be complete, the Board must provide notice of the date and time of completion of the hearing period. The public hearing period is no fewer than 45 days and no more than 60 days after the application has been determined to be complete.

Relationships to other important energy policies or siting and zoning decisions: Wyoming statutory law requires that applicants proposing to build a wind energy facility include in their application a “project plan” indicating proposed roadways, tower locations and substation locations, transmission, collector and gathering and lines, and other “ancillary facility components” (http://legisweb.state.wy.us/statutes/statutes.aspx?file=titles/Title18/T18CH5AR5.htm)

Research issues: Wyoming is home to over half of all sage grouse, an endangered species, in the United States. Conservationists have expressed concern that wind development and the building of ancillary transmission lines will harm the sage grouse. Horizon Wind, a developer, has called for peer-reviewed study to establish the impact of turbines on the sage grouse. The United States Bureau of Land Management (BLM) has announced its intention to include sage grouse conservation measures in land management plans in Wyoming and nine other western states, including Colorado, North Dakota, South Dakota, Utah, Montana, California, Idaho, Nevada, and Oregon (www.blm.gov/wo/st/en/info/newsroom/2011/december/NR_12_08_2011.html).

In an effort to protect the sage grouse, there has been a movement by conservationists, supported by the governor, to draw up “core areas” in Wyoming where no energy development, agriculture, or recreation will be allowed. According to state government estimates, the proposed areas include only 14% of Wyoming’s windy land. (Stoddard, 2009).

In an effort by the Federal Bureau of Land Management to facilitate development of renewable energy sources on public lands, the Wyoming Wind and Transmission Study is being conducted to analyze Wyoming’s wind resources in order to identify potential sites for wind power development. The study is expected to be completed within approximately three years.

Contacts:

Cindy DeLancey
Wyoming County Commissioners Association
Post Office Box 86
409 W. 24th Street
Cheyenne, WY 82003
(307) 632-5409
cdelancey@wyo-wCCA.org
State Wind Siting and Zoning Survey

Todd Parfitt
Administrator
Industrial Siting Division
Wyoming Department of Environmental Quality
307-777-7555
Todd.parfitt@wyo.gov
http://deq.state.wy.us/isd/

Citations and links:


Data collected by Lauren Teixeira, 5 Jul 2011.
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 over 95% of Connecticut’s population.

We appreciate the opportunity to provide comments regarding obsolete and burdensome regulations to towns and cities. The following regulations are among those that local officials have stated should be amended or repealed:

**Department of Administrative Services – Division of Construction Services**

- Amend Section 29-292-7e of the State Fire Safety Code to relieve local fire marshals from having to inspect every three-family dwelling each year. Fire Marshals from the State’s larger cities have stated that annual inspection of these properties is too burdensome, and in some cases where an illegal third family apartment is located, it exposes local officials to added liability if not inspected. Municipalities do not have the staff to perform this state mandate.

- Update the State Building Code as they relate to newer building standards to identify potential efficiencies for municipalities by updating the state building.

**Department of Education**

- Amend Sections 10-145d-582 to 10-145d-587 of the State Board of Education regulations to modify certification requirements for school superintendents to permit school districts to choose qualified superintendents from non-traditional, but relevant management and other backgrounds.

**Department of Emergency Services and Public Protection**

- Amend regulations to require adequate preparation and enforcement measures to minimize vibration, noise, and adverse impacts on nearby property caused by explosives and blasting agents. The regulations should be amended in consultation with the Department of Energy and Environmental Protection.

**Department of Energy and Environmental Protection – Siting Council**

- Eliminate the current regulation that requires municipalities to report to the Siting Council annually the location of telecommunication towers within their town or city. The reporting responsibility should be directed at tower owners rather than the host municipality.
Department of Public Health

- Amend regulations to allow local officials the option to decide their EMS provider and the terms of contracts, particularly to change companies that fail to adequately provide adequate services.

- Modernize current public health laws to reflect the mission and essential services provided by local health officials. Current practice mandates that local health departments perform 8 basic public health services, outlined in Public Health regulations, Section 19a-76-2. It should be amended to more accurately reflect the current practices and services provided by public health departments.

- Amend regulations to streamline testing requirements for the Emergency Medical Technician training certification process. In particular, eliminate redundant and frequent testing requirements.

- Amend regulations regarding non transient water supplies to make it easier for the development of these systems, and eliminate standards that are an undue burden on these supplies.

- Amend current regulations to provide that suspended Emergency Medical Technicians, or those prohibited from actively treating patients, should not be allowed to also be Emergency Medical Technician instructors.

- Amend the current regulations that exempt school-based day care centers from certain requirements to also include daycare centers operated by municipal recreational departments.

- Repeal the following five (5) Public Health Code Regulations as the governance is duplicated under 19-13-B42: Sanitation of places dispensing food or beverages.
  - 19-13-B40: Sanitation of Food, Fair Grounds, Ice Plants and Trailer Coaches
  - 19-13-B41: Sanitation of public fair grounds, horse shows, horse races, and automobile races
  - 19-13-B44: Sanitation of trailer coaches
  - 19-13-B48: Itinerant Food Vending and Catering
  - 19-13-B49: Catering and food service

# # #

For more information, please contact Ron Thomas (rthomas@ccm-ct.org), Bob Labanara (rlabanara@ccm-ct.org) or Mike Muszynski (mmuszynski@ccm-ct.org) of CCM, at (203) 498-3000.
Dear Governor Malloy –

I am writing to comment on the updating of state regulations Section 15-140f-1 and Section 15-140j-2. If these regulations were to change to allow online education, for knowledge based information that is incorporated in the basic boating safety course that leads to certification, it would have a very positive outcome. Having the ability to take online courses opens up the ability for many more residents to advantage of that type of learning experience as it will be used for new boaters but also refreshers for those of us who have been boating for years. On line classes afford State residents to take the class when it is best for them.

The move to online education will free current D.E.E.P. staff allowing them to expand their on water skills concept to more boaters. The on water boating education, which is being promoted by the USCG, will help to create a safer boating experience on Connecticut waters.

Small changes can make big difference, from saving funds to saving lives; these changes warrant your consideration.

Sincerely,

Peter Gumprecht
Member of CT B.A.S.S. Nation
Dear Governor Malloy –

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The move to online education will free current D.E.E.P. staff allowing them to expand their on water skills concept to more boaters. The on water boating education, which is being promoted by the USCG, will help to create a safer boating experience on Connecticut waters.

Small changes can make big difference, from saving funds to saving lives; these changes warrant your consideration.

Sincerely,

Ronald Frisk
Youth Director/High School Director
CT B.A.S.S. Nation

the D.E.E.P. Boating Division would be to shift personnel from change to One of the regulations that comments regarding the benefits of online education for knowledge based information that is incorporated in the basic boating safety course that leads to certification. As I mentioned to you, allowing the Dept. to go to online education for this portion of boating education would allow us to enter another phase of boating safety education that is being promoted by the USCG – that of on water boating education. This voluntary course would teach skills based proficiencies. Having online courses available for those that wanted to take advantage of that type of learning experience will free our staff to expand the on water skills concept.
Attached is the Executive Order issued by the Governor that provides a mechanism for commenting. Please note that the last date to comment through the Governor’s website is Monday, December 16. Also, the regulation that currently requires a class room course to satisfy the requirement for boater certification is Section 15-140f-1 and Section 15-140j-2.

I concur that we need to make it easy for new boaters to get into the sport and that adapting to the way people want to obtain their education, is prudent.
December 16, 2013

Dear Governor Malloy –

I’m writing to comment on the updating of state regulations Section 15-140f-1 and Section 15-140j-2. If these regulations were to change to allow online education, for knowledge based information that is incorporated in the basic boating safety course that leads to certification, it would have a very positive outcome. Having the ability to take online courses opens up the opportunity for many more residents to take advantage of that type of learning experience. It could be used for new boaters as well as for refreshers for those of us who have been boating for years. Online classes will allow State residents to take the class when it is best for them.

The move to online education will free up current D.E.E.P. staff allowing them to expand their on water skills concept to more boaters. The on water boating education, which is being promoted by the USCG, will help to create a safer boating experience on Connecticut waters. Just like learning to drive a car, practical experience behind the wheel of a boat is invaluable to boater safety.

Small changes can make big difference, from saving funds to saving lives; these changes warrant your consideration.

Sincerely,

Steve Deguzis
Member CT B.A.S.S. Nation
Home Health and Hospice Regulatory Revisions/Updates: Recommendations by the CT Association for Healthcare at Home

Thank you for the opportunity to conduct an independent review of current home health and hospice regulations and to offer recommendations for revisions. The Hospice and Palliative Committee as well as the Policy Committee of the CT Association for Healthcare at Home respectfully submit the following revision recommendations and ask that the respective department (DSS or DPH) contact the Association (Tracy Wodatch VP of Clinical and Regulatory Services) with any questions or need for further clarification. Tracy’s contact info is as follows: wodatch@cthealthcareathome.org or 203-774-4940.

Many of our recommendations are listed to align the regulations with current Medicare Conditions of Participation and with the state’s plan to rebalance encouraging more people to live in the home and community-based setting. In order to meet the needs of this growing population, home health care agencies will need to offer more abundant services which will require significantly more dedicated, skilled staff. As clinicians transition from their management and direct care staff roles in inpatient facilities, the skills and experience level of these qualified clinicians can and should be utilized in home health and hospice care; however, the current regulations can be limiting especially the DPH regulations for administrative and supervisory roles. We ask that you consider the following updates.

DSS Home Health Provider Manual Chapter 7:

P2: 17b-262-7 Refusal to Serve

Forms and process should be made current to ensure agency is tracking any refusals to serve and can produce tracking log should DSS request.

Remove (b) and (c) and replace with language to reflect the requirement in the DPH Home Health Care Agency regulations:

DPH regs: 19-13-D72. Patient care policies (pp14-15)

(1) Conditions of Admission:

(D) Circumstances which render a patient ineligible for agency services, including but not limited to level of care needs which make care at home unsafe, kinds of treatments agency will not accept, payment policy and limitations on condition of admission, if any;
(E) Plan for referral of patients not accepted for care;

(3) Discharge from Service:
   (A) Agency policies shall define categories for discharge of patients. These categories shall include but not be limited to:
      (ii) Emergency discharge—termination of service(s) due to the presence of safety issues which place the patient and/or agency staff in immediate jeopardy and prevent the agency from delivering home health care services;
   (C) In the case of an emergency discharge the agency shall immediately take all measures deemed appropriate to the situation to ensure patient safety. In addition, the agency shall immediately notify the patient, the patient's physician, and any other persons or agencies involved in the provision of home health care services. Written notification of action taken, including date and reason for emergency discharge, shall be forwarded to the patient and/or family, patient's physician, and any other agencies involved in the provision of home health care services within five (5) calendar days.

**P9: 17b-262-728**

Definition of Nursing Services needs to include assessment

From DPH regulations 19-13-D69 p6 ((D) Regular evaluation of patient progress, prompt action when any change in the patient's condition is noted or reported, and termination of care when goals of management are attained) —nursing services include assessment and evaluation of pt progress. Need to add to sec 17b-262-728 Services covered.

**DSS Hospice Provider Manual Chapter 7:**

P8: 17b-262-838

Services covered (a)(1): mirror Medicare CoPs for CTI requirement to bill. Verbal orders are acceptable provided a written order is received prior to billing the claim. (remove within 48 hours of the verbal order).

**RCH Regulations**

The Association respectfully requests that DPH review the section in the RCH regulations that addresses the storage and labeling of medications. With rebalancing initiatives in full swing in CT, this regulation does not allow for any
in-house medication pre-fills of any kind including, electronically locked medication boxes.

**DPH Regulations for Home Health Care Agencies:**

**P3: 19-13-D67 Personnel**

(a) The administrator of an agency shall be a person with one of the following—

1-7) should align with the Medicare CoPs which state: **Administrator, home health agency. A person who:**
(a) is a licensed physician; or
(b) is a registered nurse; or
(c) has training and experience in health service administration and at least 1 year of supervisory or administrative experience in home health care or related health programs.

(b)(1)-(4)—remove and replace with

(b)(1) An agency supervisor of clinical services (SCS) shall be a registered nurse (RN) with an active license to practice nursing in this state who has a minimum of three (3) years’ clinical experience in nursing. In addition and within the first year in SCS role, if the RN obtained nursing degree through diploma or associates’ program, said RN would also need to complete at least six credits in community health nursing and/or health care management from an accredited college or university program or school of nursing.

(f) Replace with... An agency supervisor of social work services shall be licensed pursuant to the Chapter 383b of the Connecticut General Statutes who has a minimum of three (3) years’ clinical experience in social work.

**19-13-D68 General Requirements**

(c) Professional Advisory Committee (p5)
1 There shall be a professional advisory committee, ..., one **registered nurse (preferably a public health nurse)...** this language reflects Medicare CoPs

(e) Supervisor of Clinical Services (6):
(1) and (4) where possible eliminate staffing ratios and replace with language aligned with DPH regulations for Hospice Inpatient Facilities: **The SCS is responsible for ensuring that the staffing for all services reflect the agency’s volume of patients, their acuity, and the level of intensity of services needed to ensure that the plan of care outcomes are achieved and negative outcomes are avoided.**
19-13-D69 Services

(d) Homemaker-Home Health Aide Service—consider changing the term to Home Health Aide (eliminating “Homemaker”)

(4) Supervision of homemaker-home health aides: eliminate (D) staffing ratio to align with CoPs and allow for more optimal care team integration

19-13-D70 Contracted Services

(g) A term not to exceed one year unless the parties agree otherwise.

19-13-D71 Personnel policies

P13 (a)(5) Physical examination, including tuberculosis screening per CDC guidelines and a physician’s or his/her designee statement that employee is capable of performing job functions as outlined in their job description.

19-13-D72 Patient care policies

P21 (b)(2)(K) An agency offering a hospice program shall designate a medical director (eliminate employ and replace with designate to mirror the hospice CoPs).

19-13-D73 Patient Care Plan

P23 (b) The original plan of care and any modifications shall be signed by the patient’s physician or dentist within 30 days (remove 21 days and replace with 30 days to mirror the CoPs).

(c) The plan for each agency...at least every sixty (60) days except for hospice plans of care which will be reviewed according to their established hospice benefit periods or 90 days for first and second benefit periods and every 60 days thereafter.

19-13-D76 Quality Assurance program

Align with CoPs where possible...

P25: (c)(4) eliminate 120-day report – duplicative of annual reporting requirement, not federally mandated.

(c)(5) Ensure that a copy of the annual QA report is maintained by the agency (eliminate and the progress report on implementation)
(d)(2) remove “in a 5 year cycle”

(e)(1) remove “after approval by the commissioner”.

(f) Add “Within” to beginning of sentence so sentence reads “Within 6 months after employment and annually thereafter...(this allows agencies to do sooner (90 days if appropriate).

P26  (g) replace with current CoP OBQI language from the State Operations Manual

19-13-D77 Administrative organization and records

P26  (d) remove entire sentence

19-13-D79 Facilities

P28  (c)(5)—remove entire sentence as record storage is addressed on p24 19-13-D75 (a)(4).