Western Connecticut
COUNCIL OF GOVERNMENTS

March 8, 2026

Esteemed Chairs Cohen and Berger-Girvalo,
Members of the Transportation Committee:

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment on Raised Bill No. 5462, *An Act Concerning Noise Pollution*. WestCOG supports the concepts reflected in the bill and offers several recommendations that would help ensure Connecticut's existing noise control framework functions as the General Assembly intended.

WestCOG's recommendations focus on two targeted improvements:

1. **clarifying that the state noise control regulations function as an enforceable statewide minimum standard, and**
2. **adding an alternate measurement approach for low-frequency sound.**

I. CONNECTICUT IS BECOMING LOUDER

Noise pollution is often overlooked as an environmental issue because it leaves no visible residue. Yet excessive noise is increasingly one of the most common environmental quality concerns reported by residents across Connecticut – including to WestCOG.

Several observable trends are contributing to this change. Connecticut is experiencing growing traffic volumes on many roadways, including a rising share of heavy trucks serving logistics facilities and warehouse distribution networks. Large equipment systems are becoming more common features of the built environment—from solar energy facilities and data center cooling systems to industrial ventilation equipment and the rapidly expanding deployment of air-conditioning and heat-pump compressors in residential and commercial buildings.

These technologies provide important benefits, but they also introduce persistent sound into environments that historically experienced far less continuous noise. The result is that residents today encounter more sustained background noise and more sources of mechanical sound than in previous decades. In earlier eras, quiet was the default condition in many communities. Today, maintaining quiet conditions increasingly requires deliberate public policy. These trends make a clear and effective framework for noise regulation more important than ever.

II. NOISE POLLUTION IS A SIGNIFICANT HEALTH AND ENVIRONMENTAL CONCERN

Scientific research over the past several decades has established that noise pollution is not merely an annoyance. Excessive noise exposure is linked to a wide range of documented health impacts, including sleep disturbance, cognitive impairment, hearing loss, endocrine disruption, diabetes, and cardiovascular disease. Public health researchers estimate that tens of millions of Americans are exposed to noise levels associated with increased cardiovascular risk. These exposures have been linked to hypertension, ischemic heart disease, and stroke and ultimately contribute to elevated mortality. The World Health Organization has identified noise as one of the most significant environmental risks to human health, second only to air pollution in terms of burden.

Noise pollution also affects ecological systems. Many species rely on acoustic signals for communication, navigation, reproduction, and predator avoidance, and persistent anthropogenic noise can interfere with these signals and contribute to ecological stress and reduced biodiversity. Likewise, excessive noise implicates a longstanding principle of property law: the right of residents to the quiet enjoyment of their property. Persistent and intrusive noise can undermine this fundamental expectation and interfere with the ordinary residential use of one's home.

These impacts underscore why noise regulation has long been seen as an essential component of environmental protection and community well-being.

III. CONNECTICUT ALREADY HAS A STATEWIDE NOISE CONTROL FRAMEWORK

Connecticut recognized the importance of noise control decades ago. The state enacted its Noise Pollution Control Law, finding in 1974 that:

> *"Excessive noise is a serious hazard to the health, welfare and quality of life of the citizens of the state of Connecticut; (2) exposure to certain levels of noise can result in physiological, psychological and economic damage; (3) a substantial body of science and technology exists by which excessive noise may be substantially abated; (4) the primary responsibility for control of noise rests with the state and the political subdivisions thereof; (5) each person has a right to an environment free from noise that may jeopardize his health, safety or welfare." CGS §22a-67*

Following this law, the state adopted comprehensive noise regulations in 1978. These regulations established detailed technical standards governing allowable sound levels, measurement procedures, and enforcement mechanisms.

Under CGS §22a-73, municipalities may adopt local noise control ordinances, but any such ordinance must be "at least as stringent as any state noise control plan". This provision reflects a clear legislative determination: the state noise regulations adopted pursuant to CGS §22a-69 are intended to function as the minimum statewide standard for noise regulation. Municipalities may adopt stricter provisions tailored to local conditions, but local regulation is not intended to weaken the protections established by the state noise control plan.

This structure is consistent with many other areas of public policy. In environmental regulation, the state often establishes a baseline standard while allowing municipalities to adopt stronger local protections if they choose. Similarly, municipalities routinely enforce state criminal law without needing to enact parallel local criminal statutes. In both cases, the underlying principle is the same: state law establishes a floor that applies everywhere, while local governments retain the ability to adopt additional protections when appropriate.

IV. IN MOST MUNICIPALITIES, RESIDENTS LACK CLEAR RECOURSE

WestCOG partnered with Sustainable CT and the 2025 Sustainable CT Fellows cohort to conduct the first comprehensive statewide inventory of municipal noise ordinances. The resulting report, *Noise Ordinances of Connecticut: An Initial Report on the CT Noise Ordinance Inventory* (2026), evaluated ordinances across all 169 municipalities and provides the first statewide baseline for understanding how noise is regulated locally.

The inventory found that only 78 (46%) of Connecticut's 169 municipalities have adopted a municipal noise ordinance. In the remaining 91 (54%) municipalities, residents may have no clear local enforcement pathway for noise control. State enforcement authority exists but is limited and not structured to serve as the primary mechanism for addressing routine local noise complaints. As a result, despite the existence of statewide noise regulations for nearly fifty years, most residents of Connecticut do not have a clear and accessible mechanism for obtaining enforcement of those standards when excessive noise occurs.

Even in municipalities that have adopted local ordinances, recourse may be incomplete. The inventory found that these ordinances vary widely in scope and technical detail. Of the 78 municipal noise ordinances identified statewide, only one fully satisfied the requirement of CGS §22a-73 that local ordinances be at least as stringent as the state noise control plan—and that ordinance achieves compliance simply by incorporating the state noise regulations by reference. Other ordinances match portions of the state standards but omit various provisions. As a result, local implementation of the state noise control framework varies significantly across municipalities, creating a regulatory patchwork in which the legislature's intended statewide baseline does not function clearly or consistently in practice.

V. CLARIFYING STATE REGULATIONS AS THE ENFORCEABLE MINIMUM STANDARD

Because CGS §22a-73 establishes that municipal ordinances must be at least as stringent as the state noise control plan, the General Assembly has already determined that the noise control regulations adopted pursuant to CGS §22a-69 function as the minimum statewide standard. WestCOG is not suggesting that the legislature change those standards (except to include an alternate measurement approach for low-frequency sound). The state noise regulations already exist and already serve as the baseline contemplated by statute.

Rather, the recommendation is simply to clarify that those existing regulations apply statewide and may be enforced by municipalities, regardless of whether a municipality has adopted a local ordinance or whether an existing ordinance incorporates every component of the state regulations. In practical terms, this clarification would make explicit what is already implicit in the statutory framework.

Providing this clarity would have a practical benefit for municipalities. Local officials, enforcement bodies, and municipal staff are understandably cautious about enforcing state regulations without clear statutory authority. In the absence of explicit language, municipalities may be uncertain whether they may enforce the state noise control regulations directly, particularly where no local ordinance exists or where an ordinance does not fully incorporate the state regulatory framework.

By clearly stating that municipalities may enforce the state noise regulations directly, the legislature would remove this uncertainty and ensure that the minimum statewide standards already established in law are enforceable in practice.

Importantly, this clarification would not alter the substance of the state noise regulations. Municipalities would remain free to adopt ordinances tailored to local conditions and could continue to establish stricter local standards if they choose. The state regulations would simply

function as the enforceable floor everywhere in Connecticut, consistent with the legislature's existing intent.

VI. LOW-FREQUENCY SOUND MEASUREMENT

WestCOG also encourages the Committee to consider adding an alternate measurement approach for low-frequency noise within Connecticut's existing sound measurement framework.

Connecticut's current noise regulations, adopted in 1978, provide a strong and technically sound framework for regulating environmental noise. At the time these regulations were developed, most environmental noise concerns involved general broadband sound. The regulatory framework therefore relies primarily on A-weighted sound measurements (dBA), which approximate the sensitivity of human hearing to mid-frequency sound. However, A-weighting significantly understates the contribution of low-frequency sound energy in the measured sound level. Noise sources that produce substantial low-frequency energy may therefore appear much quieter when evaluated using A-weighted measurements than they are in physical terms.

In practical terms, certain types of modern noise—particularly persistent low-frequency hum or rumble generated by large equipment or heavy vehicles—may not be fully reflected in A-weighted measurements, even though they produce substantial disturbance for nearby residents. Residents often describe this type of noise as a persistent "hum" or "drone" that may not sound especially loud but can be extremely difficult to ignore, particularly at night. Low-frequency sound behaves differently from higher-frequency noise in several important ways:

- It travels longer distances and penetrates building structures more easily.
- It is less effectively blocked by walls and insulation.
- It can produce vibration or pressure sensations that are perceived even when sound levels appear moderate.
- It often occurs as continuous mechanical hum, which can interfere with sleep and long-term residential comfort.

Many emerging noise sources associated with modern infrastructure—including cooling systems, industrial ventilation equipment, electrical transformers, and certain renewable energy systems—generate substantial low-frequency sound components.

Connecticut's existing noise regulations provide a strong and technically sound framework. Adding an alternate measurement approach for low-frequency noise would represent a small technical modernization addressing a known measurement limitation in A-weighted sound measurements, allowing the existing regulatory structure to better account for low-frequency dominated sound.

An alternate measurement approach could identify low-frequency dominated sound when the C-weighted sound level measured at a receptor exceeds the applicable A-weighted sound level limit by 15 dB, indicating the presence of low-frequency sound energy that is not adequately reflected in A-weighted measurements. Similar approaches are used in several jurisdictions to identify low-frequency dominated sound that may otherwise evade traditional A-weighted limits.

VII. CONCLUSION

Connecticut already possesses a comprehensive technical framework for noise control through the regulations adopted pursuant to CGS §22a-69. The challenge identified through WestCOG's statewide inventory is not the absence of standards but the absence of clear and consistent enforcement pathways.

Raised Bill No. 5462 presents an opportunity to clarify and reaffirm the legislature's longstanding policy that Connecticut's noise control regulations provide a minimum level of protection for residents statewide and to ensure that those protections are clearly enforceable in practice.

WestCOG appreciates the Committee's consideration of this issue and would welcome the opportunity to assist further as the Committee continues its work.

Respectfully submitted,

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