



Environmental Professionals' Organization of Connecticut

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20 November 2017

Public Utilities Regulatory Authority
10 Franklin Square
New Britain, Connecticut 06051

Attention: State Water Plan Draft Report Comments

To Whom It May Concern:

On behalf of the Environmental Professionals' Organization of Connecticut ("EPOC"), its Board of Directors has prepared this letter to submit public comments on the Connecticut State Water Plan Final Draft Report dated 30 June 2017 (the "Draft Report"). EPOC represents the interests of Licensed Environmental Professionals ("LEPs"), who are individuals authorized under Section 22a-133v of the Connecticut General Statutes to supervise and approve the investigation and remediation of environmentally contaminated sites in Connecticut. LEPs are intimately involved in the investigation and clean-up of contamination affecting the State's valuable water resources. Additionally, many LEPs are scientists and/or engineers who work on projects directly related to conservation and development of water resources in Connecticut, involving for example exploration of new supplies, water diversion permits, water discharge permits and Level A aquifer mapping. It is encouraging to see that the Draft Report recognized statewide improvements to water quality over the last several decades, in part due to expanded treatment of wastewater and remediation of polluted waters.

Overall, the "Draft Report" is thoughtful, well-researched, well-crafted, and contains a prodigious amount of information. As such, the Draft Report is a valuable repository and unifying platform for scientific information and data, and provides guiding principles and a roadmap for future decision-making and planning. The Draft Report comprehensively summarizes information on the natural water cycle as projected to be impacted by climate change, current water allocations (e.g., total runoff versus demands) for Connecticut's major and regional drainage basins, drainage basins where need/demands are not being met (or are at risk of not being met), water system infrastructure, and the panoply of laws, regulations, plans and stakeholder groups involved in decision making.

We found much to commend in the report, and have some recommendations. We particularly concur with, and have provided comments and recommendations on, the following elements of the Draft Report:

- Adherence to the overarching goal that the State Water Plan balances consumptive and non-consumptive water demands by considering social, environmental and economic factors as the "triple bottom line".
- Advocacy for continued collection and use of scientific information.
- We note that the Draft Report recommends required water quality testing for private wells with automatic reporting to the DPH and local health districts. We recommend that such testing include analysis for pesticides and fumigants in selected areas of the State known or suspected to

be at potential risk associated with the widespread presence of these substances in groundwater due to land use.

- Regarding interconnections, regionalization, and inter-basin transfers, we recommend that these management tools continue to be used in a limited, judicious manner, focused on alleviating emergencies and increasing resiliency. We recommend that limitations on the transfer of water out of state be considered, for example by limiting the amount of water permitted to leave the state as a commodity (e.g., bottled water) to a small percentage of a drainage basin's total runoff/streamflow.
- We support the directive that “where a [streamflow] impairment is being created, there needs to be a mechanism to manage the impairment”, and support consideration of the judicious use of current and possibly expanded and/or new storage facilities (e.g., reservoirs) to mitigate environmental impairment such as depleted stream flows from consumptive uses, and possibly drought.
- We support the strong consideration of the projected effects of climate change, which include a generally, but unevenly, hotter/wetter near-future climate for Connecticut. We recommend that these projections (which point to wetter wet seasons and drier dry seasons), be used in stakeholder considerations of how storage facilities may take advantage of such climate shift by accumulating water during the wet seasons and releasing stored water during the dry seasons (e.g., to adjust toward “pre-climate change stream flow conditions”).
- We support the recommended future role of the Water Planning Council (WPC) to complete early reviews of proposed water-related legislation, and to develop proposed legislation as needed. This would allow for those most informed to appropriately take the lead in setting policy.
- We strongly concur with the policy of using only the highest quality of water occurring naturally for human consumption (generally Class A or AA surface water and Class GA or Class GAA groundwater). In Connecticut, these high quality waters are generally segregated from waters used for large-scale waste assimilation (e.g., as associated with discharges from sewage treatment plants). We note, however, that some of the highest yielding well fields in Connecticut draw from aquifers that do or may underlie (and therefore may indirectly receive water from) Class B or SB rivers (such as the Connecticut River) through induced infiltration. We recommend consideration for managing water supplies that are or may be affected by Class B or SB surface water as a separate category of water supply subject to additional evaluation and testing to the extent that this is not already the case. In this way, public water supply customers using such water can be assured of benefiting from the lower risk associated with not consuming contaminants from Class B and SB surface waters, including emerging contaminants. We also note that the groundwater quality in some GB areas may be suitable for human consumption with added testing and possibly treatment, either because such groundwater is of Class GA quality despite the classification, or because the contaminants of concern are well known and can be reliably removed. Such use of Class GB groundwater may help alleviate excess demand on waters with higher classifications. Hence, we recommend that the WPC consider setting guidelines for the possible use of such class GB groundwater as drinking water.

- Finally, we support continued outreach efforts directed to stakeholders and the general Connecticut Public. The Draft Report is comprehensive and detailed enough such that LEPs and other members of the Connecticut Public, can, after digesting the report, be knowledgeable enough to make informed contributions to the Public discourse and have valuable input to decisions surrounding one of the State's most precious natural resources: water.

In conclusion, the Draft Report is extensive in scope, intensive in detail, principled but not judgmental, and fact- and science-based but sensitive to historical circumstances (such as "home rule"). We believe that the Draft Report is a useful framework for future decision and policy making, and we support its adoption and implementation.

Sincerely,

A handwritten signature in black ink, appearing to read "Seth Molofsky", with a long horizontal flourish extending to the right.

Seth Molofsky
Executive Director

Cc: Betsey Wingfield, DEEP, WPC Steering Committee Member and Policy Subcommittee Participant