



February 22, 2013

The Honorable Senator Steven Cassano
The Honorable Jason Rojas
Co-Chairs, Planning & Development Committee
Members, Planning & Development Committee
Legislative Office Building
Hartford, CT 06106

Re: Comments Regarding the Draft 2013-2018 Plan of Conservation and Development for Connecticut

Dear Sen. Cassano, Rep. Rojas and members of the committee:

The Connecticut Water Works Association (CWWA), which represents municipal, private and regional water companies throughout Connecticut, respectfully submits the following comments relative to the 2013-2018 Draft Plan of Conservation and Development.

CWWA continues to share the concerns of the CT Section AWWA's Source Water Protection Committee, environmental organizations and other stakeholders that the draft 2013-2018 Plan **does not provide the state and municipalities with adequate guidance to protect the state's watershed lands and water resources in making land use decisions.** We urge you to incorporate the language from the 2005-2010 Plan which recognizes the critical role of municipalities in water resource conservation and provides specific guidance to municipal land use commissions regarding concerns associated with development densities and the impact on water supply watershed areas, the extension of municipal sanitary sewer and water supply systems in source water areas, and ways of mitigating the cumulative effects of development on water quality.

In response to these comments, OPM has indicated that these concerns can be addressed by noting that developments should not exceed 10% impervious surface coverage. This response does not adequately address concerns that the Plan is not consistent with state and federal laws and policies designed to protect the integrity and purity of Connecticut's water resources and watershed lands.

Land use and conservation on both the state and local level are guided by the State Plan of Conservation and Development. Although municipal plans of Conservation & Development are not required to be consistent with the state Plan, municipalities do rely on the plan to guide local land use and conservation plans and decisions. Moreover, municipal land use and conservation

policies must be consistent with the state Plan in order to receive certain state grant funding. As such, the state Plan is a critical tool for protecting the state's watershed lands and water resources.

In addition, the state Plan should recognize the need for the expansion of efficient and viable water supply delivery systems that promote responsible growth including the extension of service to areas served by private wells that have water quality or quantity issues, where there is known groundwater contamination, where there can be interconnections to or acquisition of small non-viable water systems, or to limit the proliferation of small water systems that may not be able to be sustained to serve their customers. This expansion, which must be balanced with appropriate conservation goals, is often necessary to provide for public health, safety and economic viability for the community.

We are also concerned that issues relating to source water protection and watershed management are categorized under "State Agency Policies", which suggests that the references to source water protection are only applicable to state investment policies and not intended to guide local land use decisions and policies. As partners in the communities we serve, we certainly understand the need to support economic growth, however, the Plan should strive to reflect the necessary balance between supporting expanded development and protecting the state's watershed and aquifer areas. Again, although municipal plans do not need to be consistent with the state Plan under current law, the state Plan clearly guides local land use and conservation decisions.

CWWA also continues to have concerns that the Locational Guide Map (LGM) does not accurately reflect all watershed and aquifer protection areas. We hope that there are additional opportunities to ensure that the map is updated to appropriately classify such areas.

Again, thank you for the opportunity to comment on the draft plan. We look forward to working with your office to ensure that the plan continues to guide the state and municipalities in safeguarding the state's public water supplies.

Very truly yours,

Elizabeth Gara
Executive Director

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