

**Connecticut Section
American Water Works Association**
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February 21, 2013

Senator Steve Cassano
Co-Chair Continuing Legislative Committee on State Planning and Development
Legislative Office Building Room 2100
Hartford CT 06106-1591

Representative Jason Rojas
Co-Chair Continuing Legislative Committee on State Planning and Development
Legislative Office Building Room 4001
Hartford CT 06106-1591

Re: Comments Regarding the Revised Draft 2013-2018 Plan of Conservation and Development, with particular attention to its "Growth Management Principle #5: Protect and Ensure the Integrity of Environmental Assets Critical to Public Health and Safety".

Dear Senator Cassano and Representative Rojas:

The Source Water Protection Committee (SWPC) of the Connecticut Section of the American Water Works Association is comprised of water supply conservation professionals from across the state that have been tasked by our state's public drinking water providers to cooperatively effect the protection of Connecticut's current and future drinking water resources. As you may recall, the SWPC submitted comments regarding the "Draft 2013-2018 Plan of Conservation and Development" (the Plan) in a letter to the Office of Policy and Management (OPM) on October 4, 2012 (copy enclosed). This second letter to your office expands upon certain aspects of our previous correspondence and addresses the response from the OPM to our initial letter.

Based on what the OPM has described as an "unprecedented number" of comments that were submitted to your office regarding the Plan, it is very apparent that a large number of Connecticut's citizens recognize the value of the Plan and its importance in shaping the future quality of their lives. It is indeed telling that so many of those comments to the OPM, which came from a wide array of private citizens, municipalities, planning agencies, and local, regional, and statewide interest groups from every corner of the State, focused on a single issue: the future protection of Connecticut's public drinking water supply watershed lands.

The Plan addresses a number of subjects and important issues, from urban redevelopment, housing, transportation, to the conservation of our natural and cultural resources. It is especially significant that over half of the responses OPM received from the public were concerns over the Plan's lack of detailed guidance for the protection of our public drinking water supply watersheds. This concern was not only voiced by Connecticut's private citizens, but was also made clearly and repeatedly in comments submitted in all groups of respondents, including the League of Women Voters of Connecticut, the Connecticut Fund for the Environment, and the State's own Council on Environmental Quality. These

Comments Regarding the Draft 2013-2018 Plan of Conservation and Development, 2/21/13, page 2.

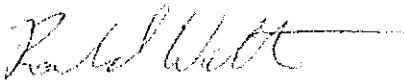
concerns were clearly in harmony with those voiced by the Connecticut Section of the American Water Works Association (CT AWWA) and the Connecticut Water Works Association (CWWA), industry groups representing Connecticut's professional drinking water suppliers. An overarching concern for the future protection of Connecticut's drinking water supply watersheds, is clearly shared by an uncommon number of individuals and groups that encompass the widest spectrum of our society and surely represent more than a vocal "special interest" water industry lobby.

Coupled with the concerns for watershed protection that were voiced by many respondents was specific disapproval of the overly-abbreviated treatment of this important issue in the Plan. Respondents from all groups have urged the OPM to reinstate the detailed language, policies and guidance regarding watershed protection that were such an important part of the 2005 – 2010 Plan. The OPM's response explaining that the profound dilution of the watershed protection aspects of the current Plan was done "to give municipalities flexibility" is unfathomable and unsupportable. Moreover, the OPM's recommendation that all of the deleted language, policies and guidance regarding watershed protection could be substituted with a brief notation encouraging developments not to exceed 10% impervious surface coverage is disappointingly and woefully inadequate.

On behalf of Connecticut's public drinking water providers, the Source Water Protection Committee of the Connecticut Section of the American Water Works Association urges the OPM to listen to the joined voices of the many citizens and groups across the state that have entreated you to reinstate the clear and specific policy statements and detailed discussions of drinking water supply watershed protection that were integral to the 2005-2010 Plan of Conservation and Development. The attached copy of our previous letter to you regarding the Plan contains an appendix of relevant passages from the 2005 – 2010 Plan that may be helpful to you in your considerations.

We appreciate this opportunity to provide further comments to you regarding Connecticut's 2013-2018 Draft Plan of Conservation and Development, and we thank the Office of Policy and Management's continued efforts to safeguard the future of Connecticut's public drinking water supply watersheds. If you have any questions regarding our comments, or if you wish to discuss these matters in more detail, please do not hesitate to call me.

Sincerely,



Ronald Walters
Chairman
Source Water Protection Committee
CT Section AWWA