

South Central Connecticut Regional Water Authority
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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

Dear Senator Cassano and Representative Rojas:

RE: Revised Draft Conservation and Development Policies Plan for CT 2013-2018

The South Central Connecticut Regional Water Authority (SCCRWA) is a public water utility which provides on average about 48 million gallons per day of drinking water to a population of approximately 420,000 people in the Greater New Haven area. As a provider of public drinking water and a major landowner in the region, the policies presented in the document are integral to protecting the quality and quantity of our source waters, and meeting the future water supply needs of our region.

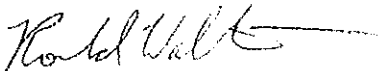
The RWA submitted comments on the Draft Conservation and Development Policies Plan (Draft Plan) dated 10/5/2012 (attached). Our concerns regarding the Draft Plan are related to an overall reduced emphasis on the protection of public water supply watersheds and aquifers from incompatible development and policies that support the development of small community water and wastewater systems. We are also concerned about restricting the expansion of public water supply systems to provide for public health and safety through professionally operated public water systems. The revised Draft Plan does not adequately address our stated concerns.

We do support the inclusion of Smart Growth Principals and the efforts to promote integrated planning across all levels of government and the policies of water supply protection and planning listed under Growth Management Principal #5. We understand the competing uses of water resources and have actively participated in State water resource planning efforts such as the Water Planning Council. In addition, we support the comments submitted by Connecticut Water Works Association.

Thank you for the opportunity to provide comments on this important document. If you have any questions, please contact me at (203) 401-2741, or rwalters@rwater.com.

Sincerely,

REGIONAL WATER AUTHORITY



Ronald Walters
Senior Environmental Analyst

October 5, 2012

**Regional Water Authority Comments
Draft Conservation and Development Policies Plan for Connecticut 2013 -2018**

1. The condensed format has eliminated several policy statements related to drinking water supplies and development activities that the RWA used in support of source protection and reasonable growth within the public water supply watersheds. Statements concerning public water supply watersheds that should be carried over in the new Plan include requiring minimum buildable lots of two acres for septic systems and the avoidance of sewer collection systems except when essential to solve area –wide problems associated with existing development. There is also a lack of references to several guidelines developed by state agencies for the protection of public drinking water supplies. *DEP Bulletin No. 11 Carrying Capacity of Public Water Supply Watersheds: A literature review of impacts on Water Quality From Residential Development* should be added to the reference list under Growth Management Principal #5.
2. The Balanced Growth areas shown on the Locational Guide Map in Hamden, Cheshire, North Branford and Woodbridge are within RWA public water supply watershed areas. The Balanced Growth area designations requires state agencies to provide a balanced consideration of all factors in determining the extent to which a proposed action is consistent with the Plan. This flexibility, however, may make certain critical water supply protection areas vulnerable to development pressure, especially given that the Locational Guide Map shows this designation in some undeveloped or minimally developed areas. Although both the portion of the Farm River water supply watershed along the Route 22 corridor in North Branford and the Mill River public water supply watershed along the Route 10 corridor in Hamden and southern Cheshire are characterized as Balanced Growth areas, these areas are quite different with regard to existing development. Much of the lower Mill River watershed is sewerred and highly urbanized. The Farm River watershed contains isolated areas of commercial development, low density residential development, large tracts of farmland, and undeveloped open space. These and other Balanced Growth areas should be evaluated in greater detail, including closer examination of existing land use conditions, to determine if these specific areas are better suited and called out for development use versus conservation.
3. The protection of public water supply watershed areas appears to be on equal footing with all other Growth Management Principles in the Balanced Growth areas. We believe protection of public water supplies should be clearly stated as the highest priority for long-term protection of public health and safety, including within Balanced Growth Areas.

4. Several sections of the Draft Plan encourage “decentralized or small-scale water and sewage systems”. These sections include Growth Management Principle (GMP) #2, page 12; GMP #4, page 18; and GMP #6, page 24. In general, we oppose these sections. Small scale or community public water systems have historically been problematic from a public health perspective, and many small system operators do not appear to have the staffing or financial capability to adequately treat and monitor their water supplies. Small water systems are also typically more vulnerable to power outages and other emergencies, and do not generally have the capacity to provide fire protection to the communities they serve. Similarly, small privately operated sewage disposal systems are frequently under financed and understaffed and may not provide adequate public health protection to their communities. We suggest that these sections be re-drafted to encourage a balanced cost benefit analysis approach to extension of public water supply infrastructure. The use of interconnections between utilities between utilities should also be encouraged.
5. Page 18, GMP #4, as noted above, we suggest replacing the last policy, “rely upon the capacity of the land to provide drinking water and wastewater disposal needs in rural areas” with a more balanced approach that considers the public health benefits of public water and sewer expansion in areas outside of the public water supply watersheds. We also strongly suggest that need for fire protection be included in any consideration of the sizing of the expansion of public water system infrastructure.
6. Page 12, The promotion of increased residential density in Village Centers that lack supporting infrastructure such as public sanitary sewers could negatively impact public water supply sources. This type of development should be consistent with water quality goals to the benefit of public water supply source protection if the Village Centers are located within public water supply watersheds. Factors for consideration include carrying capacity for wastewater systems (see above), impact of impervious surfaces, and stormwater runoff water quality controls such as Low Impact Development.
7. Page 18, The statement regarding supporting the introduction or expansion of water and sewer systems into rural areas for economic or social reasons poses concerns for the rural areas within public water supply watersheds. The expansion of sanitary sewers in public water supply watershed areas for reasons other than to address public health issues should be avoided. We urge the continuation of the current policy to discourage the introduction of infrastructure into public water supply watersheds for the purpose of accommodating new development, with appropriate exceptions in certain instances where development has already occurred, and/or added pollution controls are required to protect public water supply sources.
[2005 – 2010 Plan, pg. 7]