

Scott Bighinatti

Subject: FW: Western PWSMA Integrated Report

From: Len DeJong <LDeJong@pomperaug.org>

Sent: Thursday, April 26, 2018 12:33 PM

To: russellposthauer@ccaengineering.com; 'Daniel Lawrence' <DLawrence@aquarionwater.com>; 'Banker, David' <DBanker@themdc.com>

Cc: Dave Murphy <DMurphy@mminc.com>

Subject: Western PWSMA Integrated Report

Western WUCC Chairpersons,

Introduction

Thank you for the opportunity to submit comment on the Western PWSMA Integrated Report (“Report”) on behalf of the Pomperaug River Watershed Coalition (“PRWC”). As you know, PRWC had submitted earlier remarks on October 13, 2016 following our review of the Preliminary Water Supply Assessment. We appreciate this opportunity and understand that our comment is being submitted to you after the close of the public comment period due to other PRWC obligations. As such, our comment is not intended to revise the Report but rather to specifically address a gap in how the WUCC will consider the existing unbalance between out-of-stream and in-stream uses in its future decision making.

PRWC Background

The Pomperaug Watershed is approximately 90 square miles with watershed lands in the following communities: Bethlehem, Middlebury, Morris, Roxbury Southbury, Washington, Watertown and Woodbury. In addition, PRWC considers the Town of Oxford as a coalition partner as the recipient of Pomperaug Aquifer water supply from the Heritage Village/CT Water Company.

PRWC was founded in 1999 as a non-profit organization for the purpose of protecting the Pomperaug Watershed water resources (surface and groundwater) through the use of science and research. Scientific data goes as far back as the late 1800’s when USGS identified the geology of Pomperaug Watershed as a means to further its research and apply that data in other areas of the U.S. We consider educational outreach to be a hallmark of what we do.

Report Comment

Section 12.0 of the Report (“Recommendations and Prioritization”) is void of any findings related to stressed basins as identified in the proposed State Water Plan. As such, Report priorities are not aligned with correcting locations known to foster that unbalance. In the earlier Section 8.0 (“Potential Impact on Other Uses of Water Resources”) discussions on groundwater and interconnects is very limited to those identified by Aquarion Water Company (“AWC”), most notably the future activation of the Housatonic Wellfield.

The Report does not discuss identified stressed basins but more importantly appears not to set a go-forth process on how to examine the unbalance when the WUCC is called upon to make a decision that may affect that balance. The Report does contain a description of regulatory processes, regional and local planning that will have a positive impact. It is also encouraging to read about how enhancements such as water conservation will have a positive influence.

To address the concern stated above, PRWC recommends that the WUCC re-visit (using developing State Water Plan data) where unbalance exists between out-of-stream and in-stream needs and then develop a process that becomes “built-in” to the WUCC review process. That would included future examination of water use impacts on sub-regional basins yet not identified in the State water planning process. The idea of knowing where the unbalance exists, or where it may exist based on a future decision by the WUCC, is critical to long term effective planning. As an example, when the WUCC elects to re-assign an ESA the question needs to be asked if that re-assignment benefits correcting a know water balance deficiency or protects from a new one being created.

Closing

I appreciate the opportunity to submit these remarks and for your consideration of them. PRWC also appreciates the amount of effort that went into the planning and development of the Report. I believe that I can speak for the CT environmental community that we are available to assist you and would welcome that opportunity.

Len DeJong

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