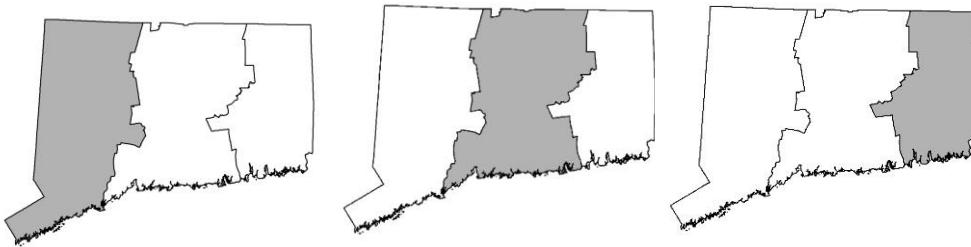


Connecticut Water Utility Coordinating Committees



October 4, 2016

Rivers Alliance of Connecticut
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This letter is in response to the formal communication dated September 12, 2016 to the Connecticut Water Utility Coordinating Committees (WUCCs) and others regarding the Coordinated Water System Planning (CWSP) currently underway. The primary concern raised in the letter is the timing within the WUCC process for consideration of environmental issues. The CWSP consists of the individual water system plans of each public water system and an Areawide supplement, which consists of a water supply assessment; exclusive service area boundaries; an integrated report; and an executive summary. Respectively, these components must be completed within 6, 12, 24, and 24 months following convening of the WUCC.

As required by Section 25-33h(d)(C) of the Regulations of Connecticut State Agencies (RCSA), the Integrated Report in each respective WUCC region must provide an overview of individual public water systems within the management area and address area-wide water supply issues, concerns, and needs while promoting cooperation among the public water systems. Additionally, RCSA Section 25-33h(d)(C)(ix) requires "Consideration of the potential impacts of the plan on other uses of water resources, including water quality, flood management, recreation, hydropower, and aquatic habitat issues."

The timing of the consideration of potential impacts of the Coordinated Water System Plan is based on a progression of information. The first step in this planning process is to report on the existing status of water supply, including an inventory of current suppliers, sources, systems, and service areas. This first step is documented in the Water Supply Assessment.

The second phase of coordinated planning effort is the determination of exclusive service areas (ESAs), wherein water providers declare their intent and desire to provide service as well as details on the manner in which they intend to do so. As part of the declaration process, the declaring entity must describe how it will provide service, including identification of potential future supply sources. The designation of an ESA to a water provider does not bring with it any right or authority to develop new supply sources, nor does it permit a water provider to transfer water from one system to another. Such actions may only occur within the regulatory permitting and approval framework that is in existence today.

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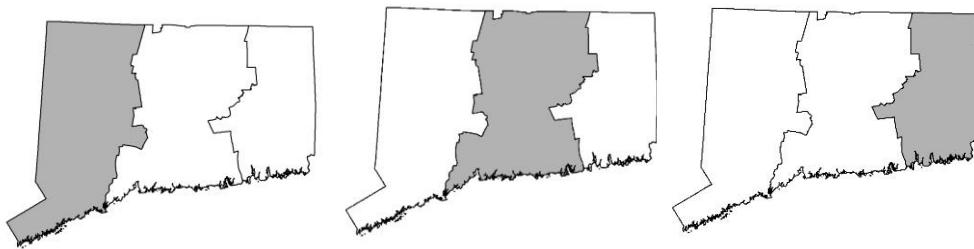
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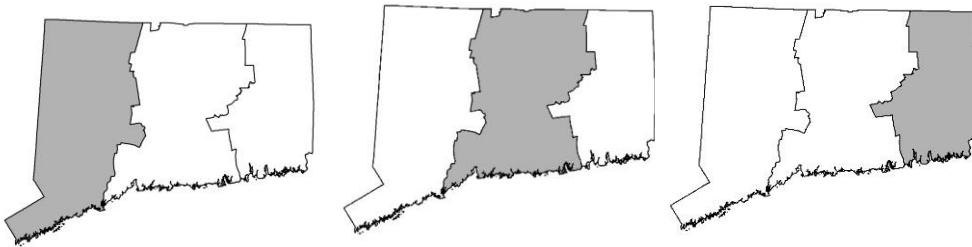
ESAs have been designated across much of the state for nearly 30 years, with large areas where service has not been needed or provided. Land development in Connecticut is regulated independently by each of the 169 municipalities through their respective planning and zoning regulations. Since much of the state is zoned for rural residential use with large lot requirements, it is possible that public water service may never occur in such locations.

The third phase of coordinated planning takes place in the preparation of the Integrated Report, wherein public water suppliers forecast future demand as well as the anticipated timing and need of additional supplies. Only then will the future anticipated conditions be defined to the point where potential impacts of the Coordinated Water System Plan on other uses of water resources can be fully evaluated. As part of the Integrated Report, potential impacts on resources will be delineated by river and/or sub-regional drainage basin, both for the purpose of evaluating identified future supply sources as well as to identify new areas for potential development of future regional supply sources. The data sources that will inform this evaluation is likely to include information from individual utility Water Supply Plans, historical regional water supply planning documents, geologic mapping prepared by the State of Connecticut and the U.S. Geological Survey, geographic information system data available from the Department of Energy and Environmental Protection (DEEP), reports available from the Office of Policy and Management (OPM), streamflow rates, natural diversity database information, location of tidal areas and significant recreational uses, and the list of impaired water bodies in Connecticut. Additionally, the following information is anticipated to be reviewed to identify potential issues associated with development of future supplies:

- USGS *StreamStats* information for 7Q10 (~99% duration) flows and specific bioperiod flows;
- Final, draft, or possible streamflow classifications per the Streamflow Standards and Regulations;
- The 2014 (or more recent, if available) DEEP *Integrated Water Quality Report* for water quality;
- 2003 DPH Source Water Assessment Reports;
- Precipitation records from the National Weather Service and/or State agencies;
- DEEP diversion permit restrictions;
- Existing flow management plans;
- Existing source management plans;
- Instream flow studies that have been completed;
- FERC hydropower permits and submitted applications;
- Current wasteload allocation information from DEEP;
- Updated county-wide flood insurance studies;
- Reservoir dam information from water utilities and DEEP;
- Local, regional, and statewide plans of conservation and development; and
- Open space and recreational plans.

The potential implications of the above items on existing and potential future water supplies will be considered, as well as the impacts of existing and potential future water supplies on aquatic resources. For example, new supply sources may be needed to counteract the effects of streamflow releases, and interconnections may be needed to overcome potential supply deficits. The anticipated work in the Integrated Report will be of a planning nature and will not replace

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the detailed site-specific analysis that would be required in support of developing a new groundwater or surface water supply source through the water diversion permitting process administered by DEEP, or permits potentially required by the Army Corps of Engineers related to impacts to wetlands. This planning effort is expected to result in prioritization of potential projects to enhance regional public water supply efforts.

The Preliminary Water Supply Assessments in all three regions are currently available for public review. The regulations are clear on what must be included in the Water Supply Assessment, including the requirement stated in Section 25-33h-1(d)(2)(A) to “*evaluate water supply conditions and problems within the public water supply management area.*” The regulation goes on to define the specific conditions and problems that must be addressed, making it clear that the regulation refers to those in the realm of providing safe drinking water. While the officers share the River Alliance’s concern for our environment, we do not agree with the interpretation that the “*evaluation of water supply conditions and problems*” referenced in the regulations equates to impacts on the environment as a result of current and historic public water supply throughout the state. Consideration of environmental issues will appropriately occur as the Coordinated Water System Planning process proceeds, following the identification of future service areas and future anticipated water supplies.

We appreciate your continued involvement and look forward to a rigorous planning process over the next two years.

Very Truly Yours,

A handwritten signature in black ink, appearing to read "R.P." followed by a stylized surname.

Russel Posthauer
Western WUCC Co-Chair

A handwritten signature in black ink, appearing to read "D.L." followed by a stylized surname.

Daniel Lawrence
Western Region Co-Chair

A handwritten signature in black ink, appearing to read "D.R." followed by a stylized surname.

David Radka
Central Region Co-Chair

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Bart Halloran
Central Region Co-Chair

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Eastern Region Tri-Chair

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