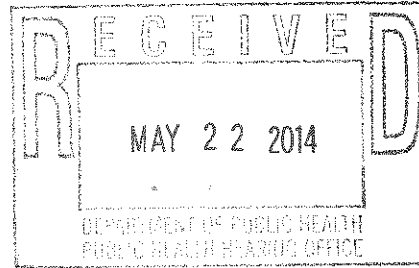




**COUNCIL of GOVERNMENTS
CENTRAL NAUGATUCK VALLEY**

49 Leavenworth Street, Suite 303, Waterbury, CT 06702 • 203-757-0535 • cogcnv.org



May 20, 2014

Kathryn Keenan
Legal Department
Connecticut Department of Public Health
410 Capital Avenue, MS#13PHO,
P.O. Box 340308
Hartford, CT 06134

RE: Proposed New Water Utility Coordinating Committee (WUCC) Region Boundaries.

Dear Ms. Keenan:

Council of Governments of the Central Naugatuck Valley (COGCNV) staff has reviewed the proposed boundaries of the new WUCC regions that were included as an attachment to the April 21, 2014 "Notice of Preliminary Alternation of the Boundaries of the Public Water Supply Management Areas and the Priorities for Initiation of the WUCC Planning Process." We appreciate that the newly formed Council of Government regions were used as a primary factor in delineating the proposed new WUCC boundaries, and agree that the new COGs can be useful partners in planning for future water supply. We would, however, like to submit the following comments about the proposed placement of our new 19 town Naugatuck Valley Council of Governments (NVCOG) region in the Central Connecticut Corridor WUCC:

- The City of Waterbury water system provides water to consumers in several municipalities, and is the largest water supplier in our region. Reservoirs to the north and west of the city in the towns of Warren, Kent, Morris and Litchfield provide water to this system. The proposed WUCC boundaries would separate the Waterbury Water System service area, located in the Central Connecticut Corridor WUCC, from its sources, all located in the Western Connecticut WUCC, making future water planning in the Waterbury area difficult.
- The City of Bristol Water system would be similarly separated into two WUCCs with much of its supply in the towns of Burlington and Harwinton being located in the proposed Western Connecticut WUCC, and its service area located in the proposed Central Connecticut Corridor WUCC region.
- The majority of the new NVCOG region (82% by area, and at least part of all 19 towns) is located in the Housatonic River Watershed. Placing the NVCOG region in the Central Connecticut Corridor would split the Housatonic Watershed into two WUCC regions. Natural drainage basins are appropriately listed as a factor that the Commissioner is required to consider in altering WUCC boundaries. The proposed WUCC boundaries would be an impediment to planning for the Housatonic watershed as a whole natural system that provides for, and is impacted by, consumer water supply.

- In response to WUCC realignments proposed in 2010, COGCVN voted on September 10, 2010 to support the realignment of WUCCs: *"Specifically, the Central Naugatuck Valley Region should be included in the Housatonic Area WUCC, and WUCCs should reflect the boundaries of the watersheds, the municipalities, and to the extent appropriate, planning regions."*

It is for these reasons that we believe that the Western Connecticut is the more appropriate WUCC for the NVCOG region, and we hope that you will consider revising the boundaries to reflect our concerns. We understand that many factors were considered when drawing the proposed boundaries, but if not addressed, we believe that the issues listed above could present a serious impediment to the future water planning process in our region.

Please don't hesitate to contact me if you have any questions regarding these comments.

We look forward to participating in the new WUCC process.

Sincerely,



Samuel S. Gold, AICP
Executive Director