

**Meeting Minutes**  
**Western WUCC Convening Meeting**  
**Brookfield Municipal Center – 100 Pocono Road, Brookfield, CT**  
**April 24, 2018 10:00 AM**

The Western Water Utility Coordinating Committee (WUCC) held a meeting on April 24<sup>th</sup>, 2018 at 10:00 a.m. at the Brookfield Municipal Center at 100 Pocono Road in Brookfield, Connecticut. Prior written notice of this meeting was given via emails from the Department of Public Health (DPH) to eligible WUCC members, chief administrative officials, local health directors, town clerks, the Secretary of State, state agencies (OPM, PURA, DEEP, CT Office of Consumer Counsel, CT DOT, CT DECD, the Commissioner of Agriculture), and other interested persons. Notice of the meeting was also posted on the DPH website <http://portal.ct.gov/DPH/Drinking-Water/WUCC/Water-Utility-Coordinating-Committee>.

The following WUCC member representatives were in attendance (listed in alphabetical order of affiliation):

<b>WUCC Member Representative</b>	<b>Affiliation</b>
Dan Lawrence (Co-Chair)	Aquarion Water Company
Tom Villa	Town of Bethel
Mike Elliot	First District Water Department
David Banker	Metropolitan District Commission
Aaron Budris	Naugatuck Valley Council of Government
Tom Quigley	Town of New Fairfield
Jennifer Murphy	Newport Academy
Tiffany Lufkin	South Central CT Regional Water Authority
Fred Rogers	Torrington Water Company

The following non-WUCC member representatives were in attendance (listed in alphabetical order of affiliation):

<b>Non-WUCC Member Representative</b>	<b>Affiliation</b>
Doug Hoskins	CT Department of Energy & Environmental Protection
Eric McPhee	CT Department of Public Health
David Murphy	Milone & MacBroom, Inc. (MMI)
Len DeJong	Pomperaug River Watershed Coalition
Dawn Tobin	Public
Margaret Miner	Rivers Alliance
Reale Lemay	Water System Specialties

A copy of the meeting agenda is attached. The following actions took place:

**1. Welcome & Roll Call**

The Chair opened the meeting at 10:04 AM. The chair requested a roll call of attendees. Mr. Murphy provided a brief refresher of the process to date and an overview of the goals of the meeting.

## **2. Review of March Meeting Minutes**

Mr. Lawrence asked if there were any comments or changes from the floor. No comments were made. Mr. Elliot moved to approve the minutes. Ms. Lufkin seconded. Members voted unanimously to approve.

## **3. Review of Formal Correspondence**

Mr. Banker stated that seven correspondences had been sent or received by the Western WUCC since the last meeting:

- 2018-03-20 – Letter from Western WUCC posted with Draft Integrated Report and Executive Summary for public comment.
- 2018-03-26 – Email with Public Comment from Mark Widomski regarding the Draft Integrated Report & Executive Summary.
- 2018-03-27 – Email from DPH regarding Newport Academy North Campus for discussion at next WUCC meeting.
- 2018-04-05 – Letter from Aquarion Water Company received requesting the modification of the Exclusive Service Area boundary between Aquarion Water Company and the Town of New Fairfield.
- 2018-04-10 – Received circular Letter 2018-09 from the CT Department of Public Health.
- 2018-04-18 – Letter with comments from the CT Department of Energy & Environmental Protection for the Draft Integrated Report & Executive Summary.
- 2018-04-20 – Letter with comments from CT Department of Public Health for the Draft Integrated Report & Executive Summary.

## **4. Public Comment**

The Chair opened the public comment period.

- Ms. Miner requested to extend the public comment period for the draft integrated report and executive summary. Additionally, Ms. Miner expressed concerns regarding what capitalized versus lower case ESA represents, consolidation or elimination of small systems, policy for changing ESA's, reviewing positives and negatives for regional interconnections, available water from water utilities and how it is calculated, awareness of WUCC membership among TNC and NTNC systems, basis for decisions of if/when to extend water systems to serve properties and standards ESA holders can enforce on developers versus minimum DPH standards.
- Ms. Miner notified attendees of a pending conference at Roxbury town hall on May 18<sup>th</sup>, 2018 to discuss water sources and quality in Connecticut.
- Mr. DeJong noted that the draft plan is a good platform for additional work but stated that he would benefit from an extension of the timeline to comment on the draft integrated plan. He also commented on section 10.5 of the Integrated report, encouraging water utilities to provide water usage data at a sub-regional basin level when possible, which could benefit watershed groups.
- A discussion of extending the comment period and/or accepting further comments ensued.

- Mr. Murphy stated that the next WUCC meeting date will be extended, so the comment period could be extended, if needed.
- Mr. Lawrence asked how much additional time would be needed.
- Ms. Miner stated that she would accept any time which could be offered.
- Mr. Villa asked how many comment periods have already been offered on other sections of the coordinated water supply plan.
- Mr. Lawrence responded that public comment periods were included in each of the two sections previously completed.
- Ms. Lufkin confirmed that notifications had been posted in local town halls.
- Mr. Lemay stated that notification could be provided to certified operators.
- Mr. Lawrence stated that prior notification had been made to system owners via letters and emails.
- Mr. Murphy reviewed the schedule for the remaining meeting, tentatively scheduled for May 22<sup>nd</sup>, 2018.
- There was a discussion among the attendees regarding whether the deadline for public comment could be extended and if formal notification of an extension is feasible due to the imminent deadlines. There was consensus among members that the WUCC would not formally extend the comment period due to the pending deadline, but it will continue to accept comments submitted for the next week and the comments would be included in the appendices of the Integrated Report.

#### **5. Discuss & Opportunity for Comment – Aquarion/Town of New Fairfield ESA Modification**

- Mr. Lawrence provided a summary of the ESA modification before the WUCC, which consists of a single parcel transferring ESA from the Town of New Fairfield to Aquarion Water Company. The parcel currently has an Aquarion water main in the roadway in front of it and is not served by the Town of New Fairfield.
- Ms. Lufkin asked if there are any other properties in the immediate area which may need service in the future, i.e. should we consider adding other parcels to the ESA modification. At this point, Mr. Murphy provided ten years of background information including the Potable Water Consent Order and the desire of the Town to interconnect with Aquarion and eventually for the Town system to be acquired by Aquarion.
- Mr. Quigley stated that the Town of New Fairfield does not currently have excess supply to provide to new customers.
- Mr. Lawrence stated that this connection needs to be made soon, due to issues with the well which currently serves the property. There could be other similar ESA modifications in the future, but this is the only one anticipated at this time.
- Ms. Miner asked how the WUCC will make policy decisions similar to the modification with New Fairfield. She asked specifically how this issue would “scale up” to larger situations that are similar.
- Mr. Lawrence responded that it is highly dependent upon the economics of each situation, in this case the property is adjacent to an Aquarion water main, so connecting makes sense.
- Ms. Miner stated that property owners affected in ESA modifications should be notified.
- There was consensus among members to proceed with the ESA modification, transferring the parcel from the New Fairfield ESA to Aquarion’s ESA.

## **6. Newport Academy North Campus - Correspondence**

- The WUCC discussed the development of a new small water system to serve the Newport Academy North Campus development within Aquarion's ESA in Bethlehem.
- Mr. Lemay is the contract operator for Newport Academy's existing small system. He provided a summary of the new system, which will serve 4 dorm buildings with 52 beds, 2 administration buildings and an equine center with a maintenance building.
- Mr. Lawrence stated that he believes that facilities similar to schools should be held to higher standards, due to the sensitive population which they serve.
- Mr. Lemay responded that all water quality tests are performed on these systems, except for radiological tests.
- Mr. Lawrence stated that due to the location, a water main extension is not feasible, but Aquarion is willing to own and operate the system, or allow Newport Academy to own and operate the system.
- Mr. Lemay invited representative of Aquarion and the Department of Public Health to visit the Newport Academy site.
- Mr. Hoskins asked if Newport Academy's two water systems will be interconnected.
- Mr. Lemay replied that they would not be connected, due to the distance between the systems.
- Mr. DeJong expressed concern with the water extraction, since the campus is located on the headwaters of the Pomperaug River watershed.
- Mr. Lemay responded that the historic water usage at the existing campus is approximately 3,000 gallons per day.
- Mr. McPhee added that DPH sent a letter regarding the need to monitor adjacent low yield wells which will need to be monitored during well testing.
- Mr. Lemay expressed concern with what is considered an effect on wells and the ability to gain access to private wells to conduct monitoring.
- Mr. McPhee stated that the statutory requirements are the same for anyone.
- Ms. Miner asked if there is any consideration if a well could effect a nearby vernal pool.
- Mr. McPhee responded that DPH does not consider such impacts.
- Mr. Elliot made a motion to approve the creation of a new water system owned and operation by Newport Academy to the proposed North Campus.
- Mr. Villa seconded the motion.
- The members unanimously approved the motion.

## **7. Review & Discuss Public Comments Received - Integrated Report & Executive Summary**

- Mr. Murphy discussed scheduling the next WUCC meeting. Potential dates discussed included 5/22, 5/29 and 6/4.
- Mr. Lawrence proposed May 22<sup>nd</sup>, which avoids the Memorial Day holiday weekend.

- There was consensus among members to hold the next meeting on Tuesday May 22<sup>nd</sup>.
- Mr. Murphy reviewed the comments received by the Western WUCC as well as the Central and Eastern WUCCs.
- Ms. Miner asked if the comments will be added to the WUCC webpage.
- Mr. McPhee responded that if the comments are thoughtful and content driven, he does not see an issue with adding them to the webpage.
- Mr. Murphy reviewed a series of recommended word changes for the recommendations discussed at last month's meeting, to provide consistent language with the other WUCCs.
- Ms. Miner asked how the report's drought recommendations align with the state drought plan.
- Mr. Lawrence responded that the three plans are not yet consistent and it will take additional time and effort, but the WUCC plans allow for this to be resolved.
- Ms. Miner stated that the regulations, State Water Plan, WUCC Plan and proposed legislation have different approaches to drought.
- Mr. Lawrence replied that utilities want the ability to determine drought triggers, since each system responds to drought differently.

#### **8. Other Business**

- Mr. Murphy discussed the term of the WUCC officers and the need for nominations and elections at the next meeting.
- Mr. McPhee suggested that the WUCC consider staggering the terms of the chair to provide an overlap in terms for continuity in leadership.
- Mr. Quigley asked if the bylaws have a clause to allow officers to continue to serve until a replacement is elected.
- Mr. Murphy confirmed that the WUCC's bylaws include this provision.
- Mr. Lawrence stated that nominations and elections would be included on the agenda for the next WUCC meeting.
- Mr. Murphy informed WUCC members of a community water system survey being conducted by the University of Connecticut and asked members to participate.

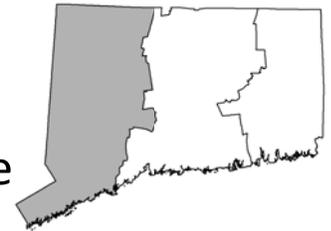
As there was no more business, Mr. Lawrence made a motion to adjourn. Ms. Lufkin seconded the motion. The motion passed unanimously and the meeting closed at 11:23 AM.

The next Western WUCC Meeting is scheduled for Tuesday May 22<sup>nd</sup>, 2018 to be held at the Brookfield Municipal Center at 100 Pocono Road in Brookfield, Connecticut.

Respectfully Submitted,

David Banker, Recording Secretary – Western WUCC

# Western Region Water Utility Coordinating Committee



## Meeting Agenda

April 24, 2018

Location: Brookfield Town Hall

Time: 10:00 a.m. to 12:00 p.m.

Russell Posthauer, Jr., Co-Chair  
russellposthauer@ccaengineering.com  
203-775-6207

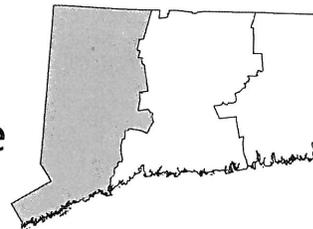
Daniel Lawrence, Co-Chair  
DLawrence@aquarionwater.com  
203-362-3055

David Banker, Recording Secretary  
DBanker@themdc.com  
860-278-7850 Ext. 3650

1. Welcome & Roll Call (5 minutes)
2. Review and Approval of March Meeting Minutes (5 minutes)
3. Review of Formal Correspondence (5 minutes)
4. Public Comment (5 minutes)
5. Discuss & Opportunity for Comment  
Aquarion/Town of New Fairfield ESA Modification (10 minutes)
6. Newport Academy North Campus - Correspondence (10 minutes)
7. Review & Discuss Public Comments Received (80 minutes)  
Integrated Report & Executive Summary
8. Other Business, if time allows

If the meeting is postponed, the revised meeting date will be  
Tuesday May 1<sup>st</sup>.

# Western Region Water Utility Coordinating Committee



March 20, 2018

Via Electronic Mail

To: Western WUCC Members  
Chief Municipal Officials  
Municipal Planning Commissions  
Local Health Officials  
Regional Planning Organizations  
Commissioner, Department of Energy & Environmental Protection  
Commissioner, Department of Public Health  
Chairman, Public Utilities Regulatory Authority  
Secretary, Office of Policy & Management  
Interested Parties

Russell Posthauer, Jr., Co-Chair  
russellposthauer@ccaengineering.com  
203-775-6207

Daniel Lawrence, Co-Chair  
DLawrence@aquarionwater.com  
203-362-3055

David Banker, Recording Secretary  
DBanker@themdc.com  
860-278-7850 Ext. 3650

RE: Preliminary Coordinated Water System Plan

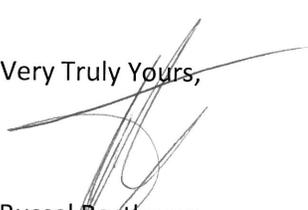
In accordance with CGS 25-33h(b), the Western Connecticut Water Utility Coordinating Committee (WUCC) has prepared a preliminary coordinated water supply plan for the Western Connecticut Public Water Supply Management Area (PWSMA). An electronic copy of the document may be found online at the WUCC website <http://portal.ct.gov/DPH/Drinking-Water/WUCC/Western-Water-Utility-Coordinating-Committee>.

At this time, the Western WUCC is requesting review and comment on the preliminary coordinated water supply plan document from all interested persons. The public comment period closes on April 20, 2018 and any final comments on the document from the public must be received by the end of that day. Discussion of comments received will occur at the next Western WUCC meeting scheduled for April 24, 2018 at the Brookfield Town Hall.

Please provide comments via electronic mail to the Officers at the email addresses listed above or via mail at the mailing address of the Recording Secretary listed below. If you have any questions, please do not hesitate to contact the WUCC officers or our consultant, Mr. David Murphy of Milone & MacBroom, Inc., at 203-271-1773 or [davem@miloneandmacbroom.com](mailto:davem@miloneandmacbroom.com).

We look forward to hearing your thoughts and comments on this document. For current information regarding the WUCC process, please visit the DPH website at <http://www.ct.gov/dph/wucc>.

Very Truly Yours,

  
Russel Posthauer  
Western Region WUCC Co-Chair

  
Daniel Lawrence  
Western Region WUCC Co-Chair

## **Banker, David**

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**From:** Mark & Joelle Widomski <jwidomski@snet.net>  
**Sent:** Monday, March 26, 2018 11:55 AM  
**To:** Banker, David

My name is Mark Widomski and I am a Planning and Zoning Commissioner for the City of Shelton, having been elected this past November. I have been an active member of the community for almost 30 years in terms of controlled development and the protection of our natural resources.

It is great to see that there is an interest in the water supply after the debacle of last year and the numerous water restrictions that were enacted by various water authorities and municipalities.

Water is a natural resource that we all take advantage of and have little thought about. Why is that? The answer is simple. We look around our environment and we see plenty of water in creeks, brooks, streams, rivers and many other places. A drive around Connecticut and one will find way too many bodies of water to count. The result is people see this natural resource as plentiful.

The reality is quite the opposite. Many of our wetland and watercourses have been filled in or rerouted in the name of progress, further reducing the supply of water. Most of these waters are polluted and require heavy treatments to make them drinkable. They are polluted for several reasons that go from acid rain from the west to heavy industrial use to over development.

I am going to focus on the over development aspect. Historically, water companies and municipal owned water authorities were vast property owners in the form of watersheds. These watersheds allowed the rain water and natural ground waters to be cleaned naturally and directed the runoff to a reservoir. The water was then further cleaned in the treatment plant and then distributed to the customers.

With the advent and reliance on treatment plants, the water authorities sold off vast sums of the watershed to private land owners. These land owners then developed these properties into developments, cutting trees and regarding the topography, thus changing forever the proverbial lay of the land. The result was a new topography that redirected the water in new and different directions thus resulting in a decline of available water to flow in to the reservoirs. Instead the water is redirected to catch basins that may have miles of piping taking the water away from the area to a new area that may have no relationship to the reservoirs. Retention ponds are also added where the bulk of the water is most likely evaporated before entering the natural ground water system. These retention ponds are usually built in a location that will provide the most benefit to the developer and not to the benefit of the water authorities and the natural ground water system.

So how do we protect the natural resource that our lives depend on? The answer is not very complicated, but it is also not very simple. The first step is we need to protect our watersheds and add to them. We need to protect our wetlands and stop filling them in for the almighty dollar. We need to have stricter regulations regarding buffer zones for these wetlands and we need to enforce them.

The second step is to stop the paving over of vast amounts of land. We need to stop changing the topography of our lands forever. No amount of engineering will ever change the way mother nature works. Simply look at the Mississippi and the amount of controls placed on it and it is still not tamed!!

Third step is conservation. Last year the bulk of the water problems were in southwest Fairfield County. A drive through the area on a typical summer day and on will find just about every house with a sprinkler system to water the grass, the shrubs and other ground coverings. One will also find the commercial buildings are also doing the same thing. The crazy part of this is even on rainy days, the sprinklers are going!! Last year, Aquarion water spent hundreds of thousands of dollars to build a temporary pipeline to move water from up county to down county so these people can continue to water their lawns. No restrictions were put into place until it was too late, and even then, they were voluntary. This practice needs to be halted.

So how to enforce water conservation? The answer is quite simple. Every customer of a water authority, private or municipal, is required to have a meter for water coming into the house. The solution is to require ALL customers of a water authority that have an irrigation system installed, shall have that system on a separate meter that can be turned on or off by the regulating water authority when a specific level of drought is declared by the state. This will include current and new construction and there is no grandfathering. Set a timeline of one year to be retrofitted and if not in compliance, then the owner faces a complete shut off, no return of service until such time a second meter is installed and a large fine.

The solutions are as I said are not very complicated. The difficulty will be the politicians and if they have the resolve to do what is correct for everyone vested in water, or if they will succumb to the political pressure by the big donors.

I applaud the effort and the input you are looking for, but the bottom line is getting the politician that is beholden to special interest to buy into a plan that may hurt those very groups. I wish the group the best of luck in moving forward and hopefully making a meaningful resolution to a problem that will have a negative impact on all of us if not resolved soon.

If you should have any questions or concerns please feel free to contact me via return email.

My comments and opinions in no way represent the opinions of the Shelton Planning and Zoning Commission, the City of Shelton or any of its affiliates etc.

Sincerely,

Mark Widomski

## Banker, David

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**From:** Mcphee, Eric <Eric.Mcphee@ct.gov>  
**Sent:** Tuesday, March 27, 2018 8:28 AM  
**To:** Daniel Lawrence; russellposthauer@ccaengineering.com  
**Cc:** Banker, David  
**Subject:** FW: Newport Academy - 2018-0043  
**Attachments:** 2018-0043 general app.pdf

Dan and Russ,

See attached. There's a letter to the WUCC included in the attachment. What is the status of this from the WUCC's perspective? They are indicating that they believe the north campus property where this (NTNC) development is to occur was erroneously included in Aquarion's ESA. I think there is some confusion on their part. I suggest this be added to the agenda and the Academy be invited to the next meeting. Their consultant, RD Lemay, indicated he will be in touch with Dan this week. I sent RD an email attempting to clarify the process and ESAs

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**From:** Jay Black [<mailto:jblack@wssct.com>]  
**Sent:** Tuesday, February 27, 2018 2:51 PM  
**To:** Mcphee, Eric <[Eric.Mcphee@ct.gov](mailto:Eric.Mcphee@ct.gov)>; Iozzo, Richard <[Richard.iozzo@ct.gov](mailto:Richard.iozzo@ct.gov)>; Carrier, Vicky <[Vicky.Carrier@ct.gov](mailto:Vicky.Carrier@ct.gov)>  
**Cc:** RD Lemay <[rdlemay@wssct.com](mailto:rdlemay@wssct.com)>  
**Subject:** Newport Academy - 2018-0043

Attached is the 1<sup>st</sup> of several emails in regards to Newport Academy – North Campus for your review  
Please contact us if you have any questions

*Jay Black*  
*Office Manager*  
*Water Systems Specialties*

860-283-8822  
Fax#860-283-8855

[www.watersystemsspecialties.com](http://www.watersystemsspecialties.com)



**AQUARION**  
Water Company

*Stewards of the Environment*

April 5, 2018

Western Region WUCC  
c/o David Banker  
Metropolitan District Commission  
555 Main Street  
Hartford, CT 06142-0800

Re: Aquarion/Town of New Fairfield, ESA Revision, New Fairfield, CT

Western WUCC:

The Aquarion Water Company (AWC) and Town of New Fairfield jointly request a revision to their respective Exclusive Service Areas (ESA's) in the Town of New Fairfield, Connecticut. The Town of New Fairfield has requested that AWC provide water service to the Fairwood Professional Building that is located in the Town's ESA. This request is to revise the ESA to allow AWC to provide water service to this building.

Attached is a map with the delineation of the ESA boundary change that shows the current AWC ESA, the Town of New Fairfield ESA, and the requested revision to the ESA's. The ESA boundary revision is drawn utilizing parcel boundaries.

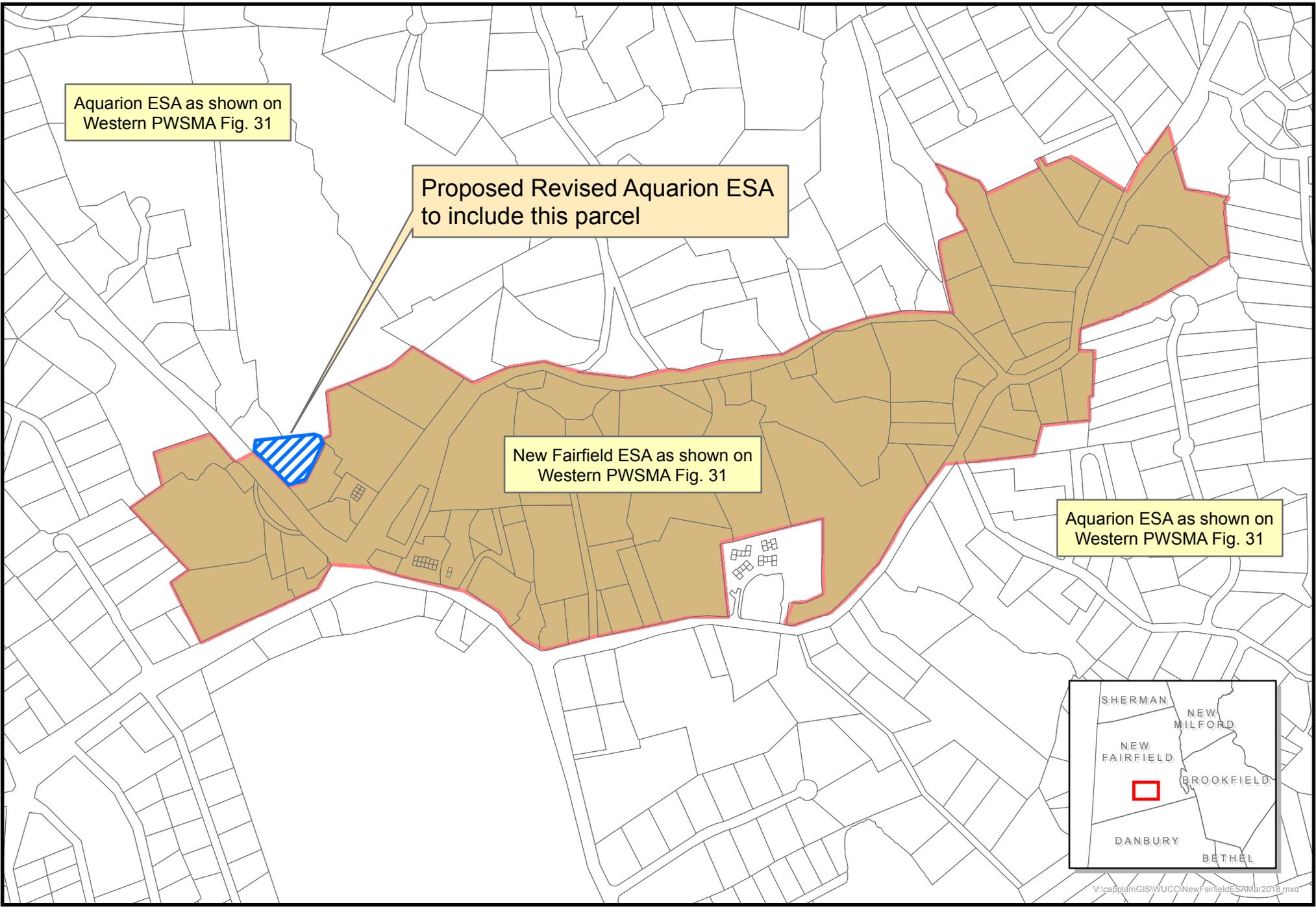
If you have any questions regarding the requested ESA revision, do not hesitate to call me at (203) 362-3033.

Sincerely,

Kenneth R. Skov  
Manager Water Resources & Infrastructure Planning

Enclosure: Map

cc: Patricia Del Monaco, First Selectman, Town of New Fairfield  
Timothy Simpkins, Town of New Fairfield  
Thomas Quigley, Town of New Fairfield



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# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH



Raul Pino, M.D., M.P.H.  
Commissioner

Dannel P. Malloy  
Governor  
Nancy Wyman  
Lt. Governor

### Drinking Water Section

DWS Circular Letter #2018-09

TO: CT WUCC Distribution List, Local & Regional Health Directors

FROM: Lori Mathieu, Public Health Section Chief, Drinking Water Section *L. Mathieu*

DATE: April 10, 2018

RE: Connecticut State Water Plan, Joint Legislative Committees Public Hearing

The Public Health Committee, Energy and Technology Committee, Environment Committee, and Planning and Development Committee will hold a joint public hearing on the Connecticut State Water Plan on **Tuesday, April 17, 2018**, from **11:00 A.M.** to **4:00 P.M.** in **Room 2C** of the LOB. The Committees are accepting electronic testimony via email at [phtestimony@cga.ct.gov](mailto:phtestimony@cga.ct.gov). Please submit electronic testimony in Word or PDF format no later than 2:00 P.M. on Friday, April 13, 2018. If you are unable to submit electronic testimony, please submit 30 copies of your written testimony no later than 9:30 A.M. on Tuesday, April 17, 2018 in Room 3000 of the LOB. Testimony submitted after the deadline will be made available to legislators after the hearing. Sign-up for the hearing will begin at 9:00 A.M. in the First Floor Atrium of the LOB. The first hour of the hearing is reserved for Legislators, Constitutional Officers, State Agency Heads and Chief Elected Municipal Officials. Speakers will be limited to three minutes of testimony. Unofficial sign-up sheets have no standing with the Committees.

If you have any questions, please contact Linda Ferraro at (860) 509-7333.



Phone: (860) 509-7333 • Fax: (860) 509-7359 • VP: (860) 899-1611  
410 Capitol Avenue, P.O. Box 340308, MS#51WAT  
Hartford, Connecticut 06134-0308  
[www.ct.gov/dph/publicdrinkingwater](http://www.ct.gov/dph/publicdrinkingwater)

*Affirmative Action/Equal Opportunity Employer*

April 18, 2018

Water Utility Coordinating Committee Chairpersons  
c/o Brendan Avery, Recording Secretary, Central WUCC, via email;  
c/o Samuel Alexander, Recording Secretary, Eastern WUCC, via email;  
c/o David Banker, Recording Secretary, Western WUCC, via email

RE: Comments on WUCC Integrated Reports

Dear Water Utility Coordinating Committee Chairmen and Members;

The Connecticut Department of Energy and Environmental Protection (DEEP) has completed its review of the Integrated Report. Thank you for the opportunity to participate in the WUCC process. DEEP is supportive of the WUCC planning process and the effort the utilities have put into developing the reports.

The Integrated Report makes a number of findings and recommendations, summarized in Table 12-1, which DEEP supports. In particular, DEEP encourages:

1. Refinement of the projected demands as new Individual Water Supply Plans are completed and can be incorporated into the overall projections. This would include refinement of the impacts of the Streamflow Regulations as more realistic impact analyses are included.
2. Further discussions and adjustments to the methodology for calculation of available water to meet MMADD, which could mitigate the apparent need for water in a number of systems across the state.
3. Use of interconnections to address supply deficits and increase system resiliency. However, it is also important to acknowledge the resiliency and environmental benefits of having multiple small sources.
4. Meeting with regulatory agencies early in the source development process and complete analysis of potential environmental impacts when developing new sources.
5. Continued coordination and work with the state agencies on drought management and water conservation to improve water efficiency.

Each regional WUCC report lists water utilities which are evaluating development of additional sources of supply, including regionally significant supplies. The overall analysis and scale are appropriate for the Integrated Report, but it should be noted that environmental and fisheries concerns have been raised for several of the sources mentioned that would factor into diversion permitting for those sources when proposed for development.

DEEP noted several items in the Integrated Report where clarification may be helpful, as follows (page numbers are from the Western Report):

1. Section 2-10, page 2-2, 2<sup>nd</sup> para: First of many times “water efficiency” is used in this document, however it is not defined or explained to any degree. Examples of efficiency should be included.
2. Section 2.3, page 2-13, 1<sup>st</sup> complete paragraph, 1<sup>st</sup> sentence: could be more explicit on what the “current process” is.
3. Section 2.4.1, page 2-14, last paragraph, last sentence: a short explanation on why warmer temperatures mean lower water quality could be added here.
4. Section 2.4.1, page 2-15, in-depth discussion of available water vs. safe yield seems out of place here in the climate change section. This would be more helpful in previous section 2.3, however, retain some basic concept of relation between climate change and safe yield here in 2.4.1.
5. Section 3.6, page 3-28, text box: Assumptions based on extrapolation of available data could easily under- or over-predict the effects of the regulations, that’s precisely why system-specific evaluations are necessary. This text box needs to be corrected.
6. Section 3.6, page 3-28, 5<sup>th</sup> and 6<sup>th</sup> bullet: Include brief explanation of “RGQ80” bioperiod reference, and insert “cfs” after flow rates.
7. Section 3.6, page 3-28: include mention of Waterbury being exempt due to Shepaug Reservoir flow plan.
8. Section 5.2.2 - May wish to add at end: In general, DEEP interconnection permitting considerations include 1) the overall need for, or ability to provide water for the interconnection based on individual water supply planning, 2) opportunity to increase water supply through decreased unaccounted for water and/or increased conservation in lieu of the requested transfer, 3) potential for environmental impact at the transfer source.
9. Section 7.4, page 7-4, second to last paragraph, second sentence, “...if the project is regulated by a federal agency, such as (USACE) **or (FERC).**” FERC added here as a possible trigger for 401 Water Quality Certification.
10. Section 7.4, page 7-5, second paragraph, first sentence, “...environmental groups can **pose petition** for restrictions on water supply development...”
11. Section 7.4, page 7-6, “The Connecticut Environmental Policy Act (CEPA) was used beginning in the late 1990s as a basis for intervention in a diversion permit application. The State Supreme Court, opening the door for the use of CEPA to oppose diversions, upheld this intervention.” Reference citation for court decision should be provided in footnote. The DEEP Legal Office hasn’t been consulted, however the diversion program is unaware of this specific precedence.

12. Section 8.0, page 8-1, 3<sup>rd</sup> para, “It is assumed that permits would not be issued for the development of a source where the yield is greater than 50% of the 7Q10 flow. While permit criteria varies depending on the resource, 50% of the 7Q10 is used ~~as~~ for planning purposes” (note typo). This criterion is too general. DEEP General Permit for Diversion of Water for Consumptive Use uses 5% of 99% durational flow as a cutoff for minimal environmental effect. Please at least explain the rationale, behind choosing this number.
13. Section 8.0, page 8-1, last para, 1<sup>st</sup> sentence: Diversion permits are not riparian rights – the permits allow reasonable use of the water, but do not constitute a “water right”. A legal interpretation is not really appropriate in a planning document of this nature. We recommend striking this paragraph.
14. Section 11.1, page 11.1, 2<sup>nd</sup> to last para: “Competing uses must also be addressed, including the potential impacts on existing diversions, active and passive recreation, aesthetics, downstream waste assimilation, **archaeological resources**, and other downstream uses.”
15. Section 11.2, page 11.3, “If the wellfield is completed in stratified drift, **and serves more than 1000 people**, the numerical modeling completed in accordance with the **Aquifer Protection Area Level A Mapping** regulations is used to predict the response of the aquifer and watercourses under different pumping scenarios.”
16. Section 12.0, page 12-1, “These volumes of water are unlikely to be developed in the (?) or nearby the region.” Missing something here.

If you have any questions on the above comments, please do not hesitate to contact me at (860) 424-3724 or [corinne.fitting@ct.gov](mailto:corinne.fitting@ct.gov).

Sincerely,



Corinne Fitting  
Supervising Environmental Analyst  
Division of Water Planning & Management  
Bureau of Water Protection & Land Reuse

Cc: Lori Mathieu, Chief, DPH Drinking Water Section

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH

Raul Pino, M.D., M.P.H.  
Commissioner



Dannel P. Malloy  
Governor  
Nancy Wyman  
Lt. Governor

### Drinking Water Section

April 20, 2018

Western Water Utility Coordinating Committee  
Central Corridor Water Utility Coordinating Committee  
Eastern Water Utility Coordinating Committee

Dear WUCC Committee Recording Secretaries:

The Connecticut Department of Public Health Drinking Water Section would like to thank you for the opportunity to review and comment throughout the WUCC process, in particular this opportunity regarding the Integrated Reports of the three WUCCs.

Among the findings and recommendations as a result of this process, the Department supports and encourages the following:

1. The reports correctly note that water utilities should re-evaluate and update future available water demand projections that may be out of date.
2. The WUCCs should foster and support aggressive interagency planning between utilities, councils of governments, and municipalities to ensure future water planning strategies are considered through all aspects of land use development and goals.
3. The WUCCs are encouraged to explore water efficiency and conservation and determine what these concepts means to utilities, why it is important, and how they can help develop efficiency projects, initiatives and education.
4. The WUCCs are encouraged to continue to develop strategies to involve small community and non-transient non community public water systems. These strategies could be aligned with the Department's policy changes following the 'three storms'. Information produced through the Capacity Assessment Tool (C.A.T.) scorecards can be



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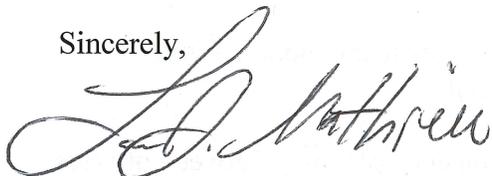


used to develop strategies with regard to failing/struggling small public water systems. The WUCCs can stress the importance of, and create a direct link to, UCONN's Connecticut Institute for Resilience and Climate Adaptation (CIRCA) study and its relation to projected need planning.

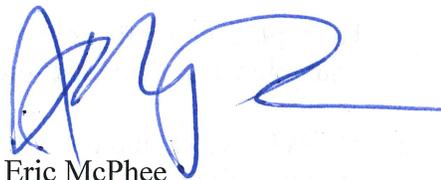
5. Encourage utilities to fund resiliency projects instead of developing new sources when planning for future demand projections.
6. The report should emphasize the importance for utilities to explore joint development of sources and or resources.
7. Encourage implementation of the Drinking Water Quality Management Planning (DWQMP) process to improve source water protection within watersheds, especially for those whose watersheds span multiple communities. Involvement at the local level and implementation of protective ordinances/initiatives (such as low impact development) will provide protection as well as water quality benefits, such as lower nutrients and lower risk of harmful algal blooms.
8. The WUCCs can coordinate with the Department's Drinking Water State Revolving Loan Fund to facilitate regional infrastructure and small system projects.

Overall, the Department believes these reports to be comprehensive and thoughtful. They will be valuable and useful for Connecticut. Should you have any questions or concerns regarding these comments, please contact us at 860-509-7333.

Sincerely,



Lori Mathieu  
Public Health Section Chief  
Drinking Water Section



Eric McPhee  
Supervising Environmental Analyst  
Drinking Water Section



Richard Iozzo  
Environmental Analyst  
Drinking Water Section

cc: Milone and MacBroom, Inc.