



TOWN OF BERLIN
Water Control Commission
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Safe Drinking Water Primacy Fee

The Berlin Water Control Commission made its first payment to the Connecticut Department of Public Health (CDPH), with the next payment due at the end of this fiscal year for a total of \$6,600.00, without any measurable assistance from the Department. I believe the Agency views this fee basis as an opportunity for carte blanche approval to use funds in other areas.

As a forty (40) year former employee of the Connecticut Department of Public Health, the need for more money and positions was a perennial issue. We were never optimally funded. What I do know, is when new positions, and/or more money came into the program, the Agency often misused those funds by appropriating them to other health-related activities. Not drinking water related. In fact, one high level administrator justified diverting funds and positions saying "because we all drink water" therefore, all activities are 'water related'. I often saw high level administrators attend conferences and meetings (across our country) that had little, if anything, to do with drinking water.

In my opinion, the existing fee is too high and should be 'sunsetting'. Minimally, the water works industry must be the "watch dog" to ensure funds collected are properly utilized.

The CDPH, although receiving Federal/State funds, should also continue to strive to be efficient. A continued source of revenue from the industry, in my opinion, may be viewed as an opportunity to eliminate the need for efficiency of operation. Therefore, industry oversight is a must, to ensure continued accountability and efficiency.

I am certain that most Public Water Systems (PWS), particularly the larger ones, including ourselves, will not get much value for our fee payment. The small PWS (under-funded, infrastructure-poor) will likely continue to consume CDPH's time. The Agency should make a concerted effort to fix the continued expansion of small systems communities, and non-communities. Well-managed PWS are being penalized by paying extraordinarily high fees that in essence subsidize the maintenance of technological and financially deficient small PWS. Towns are also responsible for the proliferation of small water systems, and if this process continues, more systems will be created, therefore adding a greater work load. The Agency should be developing a strategy to limit small PWS creation, both community and non-community systems.

The Department of Energy and Environmental Protection (DEEP) has applied fees for various activities and permits for services and actions they render. I feel the CDPH should evaluate the application of fees for various services, not just impose a general fee based on PWS size. The fee application based on the number of customers is in essence 'double taxation'. Presumably, customers pay a State Tax and then an Agency 'tax'.

Thank you for the opportunity to comment.

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