

TO: Justin Milardo, DPHDWD

FROM: Peter F Hughes, Planning & Development Director, Marlborough SEWUCC Representative

DATE: 7/15/14

RE: Statewide Realignment of WUCC Boundaries

As testified to in the public hearing held on May 19, 2014, the Town of Marlborough strongly objects to the proposal to remove the Town from the Southeast WUCC. As indicated in this letter, endorsed by the Marlborough Board of Selectman, Marlborough objections to placement in the Central Connecticut Corridor WUCC for the following reasons;

1. The SEWUCC is the only WUCC with an approved plan and the Town of Marlborough is a part of said approved plan. It makes no sense for the Town to go through another planning process when the ESA designations have been set within the bounds of Marlborough.
2. DPH Staff has indicated cost of the WUCC process as a reason for consolidation to 4 WUCC Regions. Repeating the entire approval process for Towns which already have an approved plan and ESA designations in place would incur additional and possibly substantial costs to both the State and Towns which could be avoided.
3. The municipalities comprising the SEWUCC are, with few exceptions, all small towns, similar to Marlborough in many respects. These similarities include demographics (populations <10,000), location within the Rte 2 Corridor, Town geography, scattering of smaller satellite public water systems and non transient systems throughout the Town is similar scenario in many of the Towns in the SEWUCC. These characteristics are typical of communities such as Marlborough which are located beyond the 1st and 2<sup>nd</sup> suburban rings which surround the States major urban centers. As testimony given at the public hearing on May 19<sup>th</sup> makes abundantly clear, the opportunity to share experiences and approaches for dealing with the unique needs of these small scattered systems is a major benefit to the SEWUCC member Towns, and the risk of this benefit being diluted or completely lost as the result of the proposed consolidation is a concern for both Marlborough and its neighbors.

4. The proposed Central CT Corridor WUCC extending west to east from Southbury to Mansfield, and North to south from Enfield to New Haven, would encompass 70 municipalities, including 3 of the 4 largest cities in the state (Hartford, New Haven and Waterbury) and 3 of the 2<sup>nd</sup> tier cities (Meriden, Middletown and New Britain). It might well be beyond a manageable size, and would certainly be dominated by the major population centers, whose issues and concerns relating to public water systems would be completely different than those of the smaller towns. Marlborough would be at the very periphery of this grouping, and might well be forced into major revisions of its current water management plans to comply with revised WUCC requirements based on the needs of urban water systems.
5. The economies and efficiencies of regional planning are well recognized, and the ability to enable communities to work in concert to develop and expand on regional approaches to drinking and wastewater needs within a WUCC region boundary is a great advantage to the communities and should be strongly promoted and a high priority of DPH. The current proposal, removing Marlborough and the other 6 municipalities from the SEWUCC will have the opposite effect and should be avoided. Marlborough, Hebron, Lebanon (Amston Lake), Colchester, East Haddam (Lake Hayward Area), and East Hampton are all a part of the East Hampton/Colchester Joint Treatment Facility Regional Sewer System. Having communities working in concert on wastewater and drinking water planning in a regional way should be promoted by DPH not discouraged as with the current proposal removing East Haddam, East Hampton, and Marlborough from the SEWUCC. Similarly as testified to at the May 19<sup>th</sup> Public Hearing many of the other communities within the SEWUCC have similar relationships in place or are actively under consideration or being contemplated. This further illustrates the point that the ability to share data and coordinate efforts to provide public water among the WUCC member Towns is of significant and ongoing value, and is, appropriately, a major stated goal of the WUCC effort, statewide. The proposed reorganization would certainly disrupt, and might well end such efforts.
6. The ability to regionally link overall watershed planning and drinking water planning should be given a high priority when realigning WUCC boundaries. The 10 Towns that comprise the Salmon River Watershed Committee (Bolton, Columbia, Colchester, East Haddam, East Hampton, Glastonbury, Haddam, Hebron, Lebanon, & Marlborough) formed a watershed planning group in 2007. The Towns of Colchester, East Haddam, East Hampton, Hebron and Marlborough (the heart of the watershed) fund a professional watershed manager to work on overall watershed planning effort for the Salmon River Watershed. The proposed WUCC realignment will complicate and discourage overall watershed planning within the Salmon River Watershed. As DPH is well aware, drinking water and watershed planning are often in direct conflict, and the best chances for an approach which satisfies the need of both lies in the SEWUCC boundaries remaining as is. The existing SEWUCC structure, particularly for Marlborough and the other towns in the Salmon River watershed will assure an overall

watershed planning effort. There are other similar watershed groups within the SEWUCC, where coordinated planning efforts, facilitated by WUCC membership, can be of great value in the ongoing effort to protect vital water resources of the SEWUCC region.

7. The Towns of Colchester, East Haddam, East Hampton, Haddam, Hebron, Marlborough, & Portland comprise the Chatham Health District a regulatory entity funded and supported by the Towns which enforces a board spectrum of public health regulations and requirements. Other SEWUCC Towns have similar regulatory structures (Ledge Light & Uncas HD). Keeping the Towns of the Chatham Health District in one WUCC especially the Towns who are already in the SEWUCC will lead to more appropriate drinking water planning and consistent regulatory practice. Portland is the only Town with service from a major water company within the Central Connecticut Corridor WUCC with some service provided by the MDC.
8. Combining the NEWUCC and SEWUCC as some have suggested should be given due consideration, however, since the SEWUCC is set with an approved plan how this combined region would operationally work needs further discussions prior to making such a decision and does not seem to meet DPH goal of reducing WUCC Planning costs. Also, this combination creates a large WUCC that may create too large of an area to operate efficiently and meet the water needs of the regions.
9. There would seem to be no benefit to be gained by removing Marlborough or any other Town from the existing SEWUCC, particularly in view of the approved status of the WUCC. The chances of interconnections and shared services are located on the eastside of the Connecticut River with geographically abutting Towns to the east not as likely across the Connecticut River to the west.

Marlborough strongly feels that removal from the SEWUCC is not in the best interest of the Town. Such action does not reduce DPH costs in the WUCC planning effort going forward. As indicate above Marlborough has many intra-municipal relationships within the SEWUCC that tie together the overall water resource planning and protection goals of the WUCC process. Removing drinking water planning as a major element of these ongoing joint efforts makes no sense.

If Marlborough must be involuntarily removed from the SEWUCC by DPH then the Town requests DPH for placement within the Northeast WUCC. Placement in the NEWUCC region puts Marlborough in a region with similar smaller municipalities with similar experiences and needs as in the SEWUCC and not within the incompatible Central Connecticut Corridor WUCC that encompasses the suburban and urban core of the I-91 Corridor.