



June 30, 2014

Kathryn Keenan
Legal Office, CT Department of Public Health
P.O. Box 340308
Hartford, CT 06134

Dear Ms. Keenan,

The Northwest Hills Council of Governments (NHCOG) discussed the proposed boundaries for new Public Water Supply Management Areas at its June 12th meeting and unanimously voted to oppose the proposed boundaries.

We concur with the comments submitted by the CT Department of Energy and Environmental Protection that the boundaries of the Public Water Supply Management Areas (PWSMA) should more closely follow major watershed boundaries in order to facilitate prudent water supply planning.

We are concerned that the DPH apparently failed to consider the variety of factors specified by the Connecticut General Statutes in making your proposed recommendation for the alterations. This is based on the email from Steve Messer of the CT Department of Public Health to Tyler Kleykamp of the CT Office of Policy and Management, dated January 23, 2014, which First Selectman Richard Barlow of Canton received in response to his FOIA request for all documents related to the development of the proposed alterations. That email states that the only factor considered was "municipal and regional planning agency boundaries". Mr. Messer's email states "Long story short, the DPH is going to be realigning the WUCC boundaries to mirror your new COG boundaries". There is no record that the Department considered population density and distribution in the areas; the location of existing sources of public water supply, service areas or franchise areas; existing interconnections between public water systems; natural drainage basins; topographic and geologic characteristics; or any other factors deemed relevant.

While the NHCOG generally supports the concept of using COG boundaries for sub-state service delivery, we believe watershed boundaries trump COG boundaries for the purposes of establishing PWSMAs in Connecticut. In addition, we believe the DPH should carefully consider all factors that are defined in the governing statutes in any proposal to modify the established PWSMA boundaries. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink that reads "Donald S. Stein".

Donald S. Stein
Chairman and First Selectman of Barkhamsted

cc: NHCOG Members; Area Legislators; Dr. Jewel Mullen, CT Commissioner of Public Health