

**DPH Environmental Engineering Program Comments on the Initial Draft of the 2013-2018
Conservation and Development Policies Plan for Connecticut**

The Environmental Engineering Program is recommending revisions to the State Agency Policies for several Growth Management Principals as follows:

Growth Management Principal #1: Currently there are two bullets that reference planned expansion of existing infrastructure, which includes public water and sewer extensions. One bullet mentions expansion of such infrastructure beyond existing or planned service areas only when it is necessary to address localized public health and safety concerns. It is recommended that language be added to the text above the bulleted policies to promote decentralized water and sewage system management in areas beyond existing and planned service areas to proactively prevent the creation of pollution to avoid un-necessary infrastructure expansions.

Growth Management Principal #2: Currently there is a bullet that concerns identifying mechanisms to support increased housing densities in village centers that lack supporting infrastructure. It is recommended that this bullet be expanded to state the mechanisms should consider decentralized water and sewage system management in such rural areas to avoid the creation of pollution problems.

Growth Management Principal #4: Currently there is a bullet that concerns decentralized water and sewage systems, and the expansion of public water and sewer systems. It is recommended that this bullet be re-written into two separate bullets as follows:

- Support comprehensive management of decentralized water and sewage systems in rural areas to ensure such systems are properly sited, designed and installed, and to ensure they are sufficient for short and long term needs. Support new development and intensification of existing development in rural areas utilizing decentralized water and sewage systems only when such development doesn't exceed the capacity of the land on which the decentralized systems are dependent upon for water purification and pollutant attenuation. Support proactive decentralized water and sewage system management as a preventive measure to avoid the need for public water or sewer extensions into rural areas to address problems caused by the mismanagement of decentralized systems.
- Support the introduction or expansion of public water and sewer services only when there is a demonstrated environmental, economic, social, or general welfare concern and then introduce such services only at a scale which responds to the existing need and use without serving as an attraction to more intense development and support the creation of uniform mechanism to affect such policies. Support the creation of an objective and uniform sewer need assessment protocol that considers the capacity of the land to accommodate decentralized sewage systems for existing development needs.

Growth Management Principal #5: It is recommended that a new bullet be added as follows:

- Ensure the availability of safe and adequate decentralized water supplies in areas not served by public water by supporting comprehensive management of decentralized water and sewage systems to ensure such systems are properly sited, designed and installed, and to ensure they are sufficient for short and long term needs.

Growth Management Principal #6: It is recommended that a new bullet be added as follows:

- Support integrated planning for all development including development relying on decentralized water and sewage systems for long term needs, and such planning as part of comprehensive management of decentralized water and sewage systems.

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