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To: Rebecca Jascot, Water Quality Planning Division
Connecticut Dept. of Energy and Environmental Protection (DEEP)
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From: Denise Savageau, Chair
Connecticut Council on Soil and Water Conservation

Re: **Integrated Water Planning Management Phase 2**

Thank you for the opportunity to provide comments and recommendations for the Integrated Water Planning and Management (IWPM) Phase 2 planning process. I serve on the Connecticut Council on Soil and Water Conservation (Council) as a volunteer representative of my local soil and water conservation district. I also represent soil and water conservation interests on the Water Planning Council Advisory Group (WPCAG) and the Long Island Sound Study Citizens Advisory Committee. The Council and five CT conservation districts have been actively engaged in nonpoint source pollution management, watershed management, stormwater management, and source water protection (drinking water supplies) for many years working in coordination with DEEP, CT Dept. of Public Health (DPH), USDA NRCS, and EPA Region I. It is through this lens that the following comments are offered for your consideration.

The IWPM Phase 2 recognizes the importance of taking a comprehensive approach to protecting and improving water quality in our state. It correctly identifies nonpoint source pollution and stormwater run-off as major contributors to water quality degradation with land use and nutrient loading as key issues to be addressed. The Council supports focusing on watersheds as a landscape scale planning area for addressing water quality improvement work.

The IWPM Phase 1 lists five water quality focus areas for protection and restoration: *nutrients, healthy waters for fish and wildlife, stormwater, coastal embayments, and swimming and shellfishing.* It does not include drinking water supplies in this priority list. As presented at the public information sessions held on January 16, 2024, it is the intent of DEEP to keep these focus areas for the Phase 2 process. The Council strongly encourages DEEP to reconsider these priorities and expand them to include source water protection (drinking water supplies, both surface and groundwater) and a One Water approach to water resource planning and management.

Connecticut water utilities supply water to approximately 2.8 million people daily and most (85%) of that is from surface water supplies. It is understood that in Connecticut, DPH is the lead on drinking water supplies under the federal Safe Drinking Water Act (SDWA) and CT statutes. This work focuses on oversight of and collaboration with water utilities and getting water to the consumer in a safe and healthy manner. Although the SDWA defines source water protection and requires some inventorying and monitoring of source water protection areas, it provides no regulatory framework.

and little funding. Source water protection is focused on addressing nonpoint source pollution through watershed management measures, and this is where DEEP needs to play a critical role supporting the work of DPH and the Water Planning Council in protecting our state's drinking water supplies. DEEP does have authority over the drinking water supplied by aquifers and prioritizes Aquifer Protection Act areas in many of its documents. It needs to do the same for surface water supplies by including drinking water supply and source water protection as a priority in the IWPM.

The Clean Water Act (CWA), including the IWPM program, sets the tone for land use and water quality management in our state. This includes soil health, erosion and sediment control, stormwater management, watershed management, and inland wetlands and watercourses protection. DEEP should be proactive in terms of planning and regulatory actions that protect our drinking water supplies. Currently, DPH and/or water utilities do not have regulatory authority over land use and stormwater permitting. They can provide comments to the regulators. They also inspect watersheds and may step in once a drinking water supply is being impacted. This, however, is reactive approach to water quality. Source water protection should be proactive and prevent pollution in the first place.

Generally, DEEP does not ask applicants to specify whether a site is in a public water supply watershed on applications, including for stormwater permits. DEEP does often ask for information and special consideration for aquifer protection but ignores surface drinking water supplies. DEEP treats drinking water supply watersheds the same way that they treat other watersheds, which may not be the best approach with respect to public trust considerations. An acceptable risk for recreational use, for instance, may not be the same as an acceptable risk for drinking water supplies. Additionally, DEEP forestry and open space interests need to treat source water protection as a priority set by its Water Quality Planning Division. The Open Space Plan, as currently written, is very proactive about protecting source water. The Forestry Management Plan mentions source water protection, but it should be expanded on. Without DEEP water resources making it a priority, we are afraid it will fall off the plate for these other DEEP divisions with important roles to play in watershed management and source water protection. DEEP can be proactive by updating its current application process to include source water protection and continue to include it in other planning documents relating to open space, forestry, and climate change.

DEEP watershed staff have taken a crucial step in source water protection by collaborating with the Council and USDA NRCS and integrating National Water Quality Initiatives (NWQI) and EPA 319 watershed planning. Two excellent examples include the Farm River Watershed in south central Connecticut, and the Little River Watershed (Roseland Lake) in northeastern Connecticut. We need to build on this effort. Including source water protection in the IWPM 2 document is key.

Climate change is impacting water resources across our state both in terms of water quality and quantity, including our drinking water supplies. More than ever, Connecticut will be relying on our working and natural lands to provide nature-based solutions to address water resource concerns. Although the CWA does not address water quantity per se, the relationship between water quantity and water quality is important. This is critical as we address emerging issues such as harmful algal blooms. Additionally, with source water protection watersheds being a subset of watersheds draining to Long Island Sound, prioritizing them for action also directly protects the integrity of the Long Island Sound.

Thank you again for this opportunity. Please do not hesitate to contact me if you have any questions at dmsavageau@msn.com or 203-918-9693.

The Connecticut Council on Soil and Water Conservation is set up by State Statute to assist the Commissioner of the Department of Energy and Environmental Protection (DEEP) with the coordination of soil and water conservation, protection, and management across the state. The Council brings together local, state, and federal agencies involved in such matters with its membership including the 5 Conservation Districts, DEEP, Dept of Agriculture, UConn Extension, USDA Natural Resource Conservation Service, USDA Farm Service Agency, CT Agricultural Experiment Station, and the CT Resource Conservation and Development Council. There is a similar coordinating body in every state, creating a national network of state soil and water conservation agencies providing for technical transfer of scientific knowledge and best practices across the nation.