



January 11, 2013

TO: Department of Energy & Environmental Protection

RE: **Phosphorus Reduction Strategy for Inland Non-Tidal Waters**

The Connecticut Conference of Municipalities appreciates the opportunity to submit comments on how best to (1) proceed with the Department of Energy and Environmental Protection (DEEP) efforts to reduce phosphorus in certain state waters and (2) meet the requirements of PA 12-155, which requires collaboration with municipalities to establish the appropriate state-wide response, approach, and scientific methods for addressing phosphorus levels.

We are appreciative of DEEP's willingness to-date to meet with affected municipalities and their representatives to have an active dialogue on individual permits, which certainly will impact all municipalities in the end.

However, CCM continues to have concerns about the significant costs that meeting the phosphorus reduction requirements could pose to towns and cities. Municipalities continue to struggle in this down economy and are facing the potential for substantive cuts in state aid. In addition, there have been credible questions as to the reliability of the science that has been employed to develop the current strategy, leaving municipalities concerned that even after investing millions of dollars in plant upgrades there is no guarantee that the methodology will prove to meet the desired outcome.

CCM supports the comments and collaborative process as outlined and submitted by the Connecticut Municipal Nutrient Group, and urges DEEP to:

- Establish a collaborative process to fully vet the issues still unresolved pertaining to the phosphorus reduction strategy - identifying and agreeing on the best scientific approach, viable options for compliance, timeframe for compliance, etc. We are confident that the process engaged for negotiating and establishing the state's stream flow regulations is a model that will work for phosphorus as well.

CCM looks forward to working with DEEP, and the affected towns, toward a resolution that balances the needs of the environment and the demands -- both administrative and financial -- placed on municipalities and their residential and business property tax and rate payers.

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If you should have any questions, please do not hesitate to contact Kachina Walsh-Weaver, State Relations Manager for CCM at (203) 710-9525 or [kwalsh-weaver@ccm-ct.org](mailto:kwalsh-weaver@ccm-ct.org).