



## FIRST DISTRICT WATER DEPARTMENT

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February 8, 2019

Lori J. Mathieu  
Public Health Chief  
Drinking Water Section  
410 Capitol Ave., MS #12DWS  
Hartford, CT 06134-0308

Re: Comments on Safe Drinking Water Primacy Assessment Fee

Dear Lori;

We have the following comments on the proposed Safe Drinking Water Primacy Assessment Fee language:

1. The proposed cap on the fee at \$5 per service connection is almost twice the current \$2.57 fee. We believe this gives the DPH too much freedom to increase the fee, especially allowing for a single rather than incremental increase. This could be addressed by having increases which are more than nominal should be approved by the legislature annually.
2. There should be a maximum amount authorized to be collected with the fee. This maximum should correspond with what resources are being funded by the fee. The information regarding resources funded should be well documented and accessible to those subject to the fee.
3. The fee should not be authorized in perpetuity; the legislature should have to periodically evaluate and re-authorize whether to have the fee, its method of assessment and its magnitude.
4. The DPH has acknowledged that the smallest systems require more DPH resources to regulate and inspect, however the proposed fee for the Non-Transient systems is only \$125 annually.
5. The DPH should be required to report on the staff supported by the fees, and their efficacy in a transparent way that includes public input or review by legislature. The report should include measures of the backlog of applications, what other resources currently support the Drinking Water Section that will be replaced by the revenue from this fee and steps to reduce regulatory burden and improve responsiveness.

If you have any questions on these comments please contact me.

Very truly yours,

Dominick M. Di Gangi, P.E.  
General Manager  
District Engineer