



November 16, 2017

State Water Planning Council  
c/o Public Utilities Regulatory Authority  
10 Franklin Square  
Hartford, CT 06051

**RE: Comments on the Draft Connecticut State Water Plan**

Members of the Connecticut State Water Planning Council,

The Connecticut Water Pollution Abatement Association (CWPA) was formed in 1966 to support wastewater issues for the State of Connecticut. We represent nearly 100 Water Pollution Control Facilities and a network of over 850 certified wastewater operators serving more than 2,000,000 Connecticut residents. As representatives of the CWPA, we wish to provide commentary on the proposed draft State Water Plan, as it will affect the Connecticut wastewater community.

The Connecticut Association of Water Pollution Control Facilities (CAWPCA) is dedicated to improving, enhancing knowledge, and understanding the interests of publicly owned/operated WPCA's or wastewater management entities within Connecticut. We represent our members as well as the 150+ Connecticut WPCAs which serve more than 3,000,000 sewered and non-sewered residents.

The CWPA & CAWPCA both recognize that the development of a strategic statewide water plan is a critically important undertaking. Surprisingly, Connecticut is one of the few states remaining in the U.S. that does not have a comprehensive water plan, and our wastewater utilities and local WPCAs feel the repercussions of this lack of policy every day. As you would expect, the CWPA & CAWPCA have been very supportive of the State Water Planning Council's development of a State Water Plan, in accordance with Public Act 14-163.

The leadership team of our organization has read the Draft State Water Plan and provides the following comments for consideration:

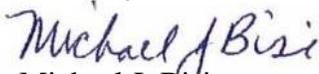
- In general, we were disappointed in the lack of attention the Draft Plan has for Wastewater topics. This document reads as a "Draft Drinking Water Plan" with less mention of wastewater than appropriate. There are some very important challenges regarding wastewater in Connecticut, which the Plan did not identify. These include:
  - Major challenges faced by shoreline communities in protecting the water quality of Long Island Sound balanced against the perception of sewer induced growth. The CTDEEP is attempting, but struggling, to find a suitable solution, and shoreline communities are spending incredible amounts of public funds on partial solutions. The Draft Water Plan must include suggestions for revisiting current wastewater disposal policy through a more modern lens.
  - Biosolids are a byproduct of both water and wastewater treatment therefore are a critical consideration in the State's water future. Connecticut lags most other States in how

utilities can handle biosolids (land application, agricultural recycling, etc.), and the Draft Water Plan is silent on this issue. Section 5.2.3.6 discusses “Agricultural Practices,” and is a good place to mention biosolids as a recycling/reuse component (i.e. land application) that should be addressed.

- The State’s water comprises Stormwater, Drinking Water, Wastewater, and Surface/Ground Water; however, the Draft Water Plan paid very little attention to Stormwater issues. In fact, the majority of the Draft Plan focuses on Drinking Water, which is one of the smallest pieces of the State’s total water picture.
- We did not observe any discussions in the State Water Plan about the challenge of working in the Water industry with multiple state agencies having varying policies. CTDEEP generally regulates the wastewater community and the CTDPH generally regulates the water community. However, there is overlap, and these overlaps often result in significant challenges and disputes being the agencies and their respective policies. This can be very disruptive to the utilities causing delays, increased costs, and a general lack of clarity. The State Water Council from the early 2000’s recommended a merging of the agencies upon the conclusion of their work and the Draft Water Plan should reiterate and build from the recommendations of this group’s efforts.
- Sewer authorities have a critical role in charging sewer use charges and each individual WPCA is required under current state statute to set Sewer Use Fees at their local level. There are multitudes of rate collection models that are generally appropriate for the local community they serve. Section 5.2.3.1 item 5 suggests that established structured sewer service connection fees and rate structures should be revisited. The Plan should acknowledge that this is up to the local WPCA and clarify that the State should not dictate how local sewer rates are structured.
- Wastewater reuse or recycling is a current trend in Connecticut and throughout the nation. We are pleased that the Draft Water Plan mentions reuse in several areas. Section 5.2.3.2 item 11 states that the State should review and appropriately modify existing regulations, guidance, and policy documents for wastewater reuse; however, there are no current regulations, guidance and policy documents for wastewater reuse. In fact, Connecticut is one of the last four states in the U.S. without them.

Thank you for considering our comments on the Draft State Water Plan. We may provide additional commentary as details further evolve, and we suggest that in subsequent statewide planning efforts, groups with larger vested interests should not be superseded by louder and smaller interested parties.

Sincerely,



Michael J. Bisi  
CWPAAP President

Superintendent of Sanitation  
Town of Glastonbury



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CAWPCA President

General Manager Water Pollution Control  
City of Waterbury