

FRWA Position on Connecticut's State Water Supply Planning
October 2013

The Farmington River Watershed Association is a private non-profit citizens group that for 60 years has been dedicated to preserving, protecting, and restoring the Farmington River and its watershed lands. While our main focus is the 609 square miles of the watershed itself, it is essential for us to take a position on statewide water supply planning because the Farmington Watershed is the single biggest source of surface drinking water in the state of Connecticut. The Nepaug River and the East Branch of the Farmington River are impounded to form Nepaug Reservoir and Barkhamsted Reservoir, which together have an approved safe yield of 77.1 million gallons a day. In addition, part of the river's West Branch is impounded in Colebrook River Reservoir and West Branch Reservoir, which together have the potential to supply approximately 20 million gallons a day.

Thus the Farmington Watershed contains a large resource for meeting the demands of development in greater Hartford, but in future the demand may not stop there. As climate change brings more extreme weather patterns, the state could come to rely more and more on such large reservoirs to capture precipitation in storm events and tide us over hot dry spells. The combination of statewide development pressure and the possibility that other water sources will become less reliable could make the Farmington Watershed reservoirs a tempting resource to tap for ever-wider regional water needs.

The needs of the Farmington Valley and greater Hartford should have first priority. Besides furnishing high-quality drinking water, the Farmington River and its tributaries have many values that enhance the prosperity and quality of life in the valley towns and the capital area. The river's attractions draw visitors from across the country to partake of superb fishing, scenic beauty, riverside trails, excellent flatwater and whitewater paddling, and habitat for a healthy diversity of plants, animals, and aquatic life.

At present, a balance is maintained among these multiple uses for the river's water. FRWA's intent is to maintain and even improve this balance as the state develops a statewide water supply plan. Ensuring adequate water supplies and growth across the state should not come at the cost of losing the Farmington River's multiple economic values and ecological services at the more local level.

With these concerns in mind, FRWA has the following positions on statewide water planning.

Maintain the current laws regarding use of Class A sources for drinking water. One possible solution to Connecticut's water supply dilemmas could be to tap abundant but lower-quality sources of surface water that contain effluent from wastewater treatment plants. FRWA opposes adopting a lower standard for drinking water in Connecticut. Changing the state standards is unacceptable, given the potential effects of contaminants such as pharmaceuticals even in extremely low concentrations, the high cost of adequate water treatment, and our proven ability to conserve water.

Structure water rates to favor conservation. FRWA supports the Water Planning Council Advisory Group (WPCAG) recommendations to the Water Planning Council regarding rate structures that would favor conservation.

Find new strategies to fund infrastructure maintenance and upgrades. FRWA shares the concern of many water companies and agencies about the underfunding of infrastructure maintenance. Water companies need to fund necessary infrastructure maintenance and improvement by means other than selling more water. FRWA supports the adoption of innovative rate structures and the development of other means for supporting infrastructure maintenance. For example, WICA, the Water Infrastructure Conservation Adjustment for private water companies, has criteria for allowing a company to recover costs of infrastructure improvements with a surcharge on bills. Public utilities need also need options and incentives for covering infrastructure costs in a timely way.

Improve the function of Water Utility Coordinating Councils (WUCCs) or assign their function to other entities.

If the WUCC process is to be retained rather than scrapped as a means of attaining comprehensive, integrated statewide water supply planning, then FRWA supports

- adequate resources to the agencies responsible for developing WUCCs;
- overall, statewide consistency in the development of WUCCs;
- a statewide review of the WUCC management areas to update them with new information;
- a requirement for water companies to show an adequate plan for serving entire Exclusive Service Area before being granted one;
- a water company's subsequent investment in any Exclusive Service Area awarded;
- increased municipal and other stakeholder input in the WUCC process.

Restore more access to water utility information under the Freedom of Information Act.

Water supply planning requires that the relevant agencies and stakeholders have reasonable access to the water supply plans, water utility documents, or derivations thereof, needed for informed discussion. At the moment, such documents are exempt from FOI requests for security reasons. Documents that are made available are so heavily redacted that they are hardly useful.

Maintain and restore USGS stream gages.

FRWA supports continued and restored funding for maintaining USGS stream gages across the state. The historic streamflow information from these gages is essential to long-range planning and to monitoring long-term trends.

Retire unused diversions and track use of diversions.

FRWA supports the retirement of unused registered diversions with no plans for use; adoption of standards to measure flow from registered diversions, a requirement for annual reporting of monthly withdrawals, and required fees for registered diversions. These measures should be based on updated information that emerged from the development of state streamflow regulations.

Review potential sources of drinking water to be tapped by the Metropolitan District Commission. In an agreement signed among the MDC, FRWA, and the Town of Portland in 1998, the MDC agreed to tap wellfields in Glastonbury before tapping the Farmington River's West Branch Reservoir as a source of

drinking water. The viability and potential of the Glastonbury wellfields as a source of drinking water should be reviewed periodically and their status disclosed to stakeholders.

Protect drinking water lands.

FRWA supports an improvement in the ability of the Department of Public Health (DPH) or other state agency to protect drinking water lands not owned by a water company. For example, one proposed solution that FRWA may support would be local watershed management areas with protections similar to those of inland wetlands.