



# CT-PHCC

PLUMBING-HEATING-COOLING CONTRACTORS OF CONNECTICUT

**TESTIMONY  
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CT ASSOCIATION OF PLUMBING, HEATING & COOLING CONTRACTORS  
BEFORE THE ENVIRONMENT COMMITTEE  
MARCH 7, 2011**

Thank you for the opportunity to comment in opposition to **SB-1020, An Act Concerning Stream Flow Regulations**.

The Connecticut Association of Plumbing, Heating and Cooling Contractors (CT-PHCC) is dedicated to the promotion, advancement, education and training of the industry for the protection of the environment, and the health, safety and comfort of society. As such, CT-PHCC is concerned that even without affecting groundwater supplies, the proposed stream flow regulations may result in public water supply shortages in many communities. In addition, questions regarding the availability of water to meet residential and commercial needs will also undermine Connecticut's business climate, making it difficult to attract and retain much-needed jobs. We therefore urge rejection of HB-6505 which fails to mitigate the following concerns:

#### **Public Water Supplies**

Plumbing contractors play a vital role in ensuring that residents and businesses have the water they need to function on a daily basis. Because PHCC members are involved in the actual installation and maintenance of water devices and systems, we see firsthand how critical a reliable supply of clean, safe water is to our residents and businesses. We are very concerned that the draft stream flow regulations will result in water supply shortages in many communities. These shortages will disrupt daily lives and business operations in a number of communities. Although the regulations provide for some exemptions and variances from the regulations, the state Department of Environmental Protection will have sole authority to approve those exemptions or variances. The regulations give too much authority to DEP to dictate where and how construction will occur, without any consideration of the state's economic development needs or public health needs.

#### **Water Conservation**

The proposed regulations anticipate that water supply releases into the streams will be offset by more aggressive water conservation measures. PHCC supports public policy designed to promote the efficient use of water in agriculture, municipalities, homes, businesses, factories, offices and institutions. Furthermore, PHCC supports public policy that mandates the installation and use of water-conserving plumbing systems that are proven effective through sound science and an approval process that includes all parties in open discussion and decision-making to ensure that such systems are compatible with existing water and sewer infrastructure.

However, our experience with such systems, which have become more popular due to rebate and other incentive programs, is that water conservation will not be at all sufficient to make up for the large quantities of water that will be required to be released into the streams to protect the fish. In addition, the stream flow regulations may force the use or mandate of water conservation technologies that have

not been thoroughly tested and may not be supported by the current infrastructure. At this time there are concerns that America's existing infrastructure cannot handle the water efficient products being considered, such as high efficiency toilets, waterless urinals or other ultra-low water consumption products. Testing and analysis should be performed for both residential and commercial systems before mandates are adopted. The impact of these low water consumption products on the entire plumbing system must be considered.

It is also our understanding that customers will face increased water use restrictions during various periods of the year. While our customers have a good track record of complying with such restrictions during actual droughts, customers will be frustrated by such restrictions if they occur more frequently and during periods when we have had sufficient rainfall.

#### **Infrastructure Costs**

The proposed stream flow regulations will require significant investments in infrastructure which will be paid for by customers of water companies. Although compliance is spread out over fifteen years, many systems will have to begin construction and renovation projects now in order to achieve compliance. However, the state does not have any program for assisting companies fund improvements in their water infrastructure. We therefore urge rejection of the proposed regulations until the state and/or federal government develop a balanced plan for funding improvements to our water supply infrastructure.

#### **Connecticut's Economy**

The vast majority of our members provide plumbing services in the residential market, which has slowed down considerably due to the economy. In 2009, permits for new home construction trailed last year's pace by 39 percent, marking the fifth straight year of declines. Customers are also very nervous about undertaking any renovations or remodeling projects.

As predominately small businesses, we are working hard to make ends meet and cutting costs where possible in order to keep our employees on the payroll and our doors open. Our competitiveness is directly linked to the state's overall economy. We are therefore very concerned that questions regarding the availability of water to meet residential and commercial needs will make it even more difficult to attract and retain much-needed jobs in Connecticut.

In addition, cumbersome state and local permitting requirements already make it difficult to initiate new construction and renovation projects. Given DEP's already broken permitting processes, we are concerned that this effort will create further delays in the permitting process and additional hurdles to overcome in getting people on the job.

Although many of our members enjoy fishing and are supportive of efforts to protect fish, the proposed stream flow regulations appear to have a huge price tag, both in terms of cost to customers and to the state's economy, which does not appear to be justified by the underlying goal of the regulations.

**We therefore oppose any attempt to expand the regulations, as called for in HB-6505.**

*CT-PHCC is a not-for-profit trade association that represents the professional plumbing, heating and cooling contractors in the state of Connecticut. CT-PHCC and its members are committed to protecting the health and safety of the public. Contractors who belong to the association have demonstrated reliability and trustworthiness and are licensed by the state of Connecticut.*