



**Testimony
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Connecticut Water Works Association (CWVA)
Before the
Public Health Committee
March 23, 2011**

The Connecticut Water Works Association (CWVA), a trade association of municipal, regional and private water companies, submits the following comments relative to **SB-1203, An Act Concerning Water Protection**.

Sections 1 and 2 - These sections require the state Department of Public Health (DPH) and the Water Planning Council to develop a list designating sources or potential sources of water supply that require protection. The Water Planning Council is comprised of one representative from each of the following agencies: 1) the state Department of Public Utility Control; 2) the state Department of Environmental Protection; 3) the Office of Policy and Management; and 4) DPH. If the consolidation bill before the legislature is passed to create a Department of Energy and Environmental Protection, the Water Planning Council will then only have three members since the Department of Public Utility Control is being eliminated as a member of the Water Planning Council.

The bill does not include any criteria for determining whether such sources of supply require protection. It also does not address whether sources not included on the list may be utilized as water sources.

As stewards of the state's water resources, CWVA members are committed to supporting efforts to protect the state's water supplies. Although we support the goal of Sections 1 and 2 - to protect and preserve waters to meet the public health and safety needs of residents and businesses – we are concerned that the process outlined in the bill lacks any clear parameters and fails to involve critical stakeholders, including Public Water Suppliers, in determining which sources may require protection.

State law already prohibits discharges from wastewater treatment plants into public water supply watersheds. This provision ensures that, unlike other states, Connecticut's public water supplies are at very little risk of exposure to certain contaminants that may be present in the wastewater stream. We are unclear how the bill provides any greater protection.

Section 9 – CWVA *opposes* **Section 9 of SB-1203** which may undermine the ability of Public Water Suppliers to utilize certain groundwater sources needed to provide adequate water supplies to Connecticut residents and businesses. Under state and federal law,

public water suppliers are already required to monitor, treat and test groundwater supplies to ensure compliance with the federal Safe Drinking Water Act. Public Water Suppliers are also required to conduct periodic sanitary surveys of all groundwater systems which include the evaluation and the identification of any deficiencies in the system.

Deficiencies must be corrected to ensure that they do not cause, or have the potential for causing, the introduction of contaminants into the water delivered to consumers. Public Water Suppliers are also required to do source water monitoring. These requirements ensure that groundwater supplies delivered to consumers are safe.

However, Section 9 authorizes the department to deny a plan to establish a new source of water supply if the department finds the proposal affects the adequacy of nearby water supply systems or an existing or potential threat of pollution may adversely affect the new source of water supply. At a minimum, a utility should be allowed to install a well, complete testing and determine the actual water quality and treat the water in compliance with state and federal standards. If the pollution or threat of pollution can be addressed through monitoring and/or treatment, the state should not be permitted to deny the establishment of this source.

There have been instances where the department has tried to deny the use of a source, such as a back-up well, because of some potential for pollution without duly considering whether the pollution could be remediated. By limiting the ability of public water suppliers to utilize these sources, this section may undermine efforts to ensure system redundancy and safety.

Section 10 – Well Testing – Although this section is not applicable to public water suppliers, we did want to point out that the tests required in this section may be costly and there is some question as to whether there is sufficient laboratory capacity to test for these contaminants without creating undue delays for homeowners.

Section 11 – CWWA supports Section 11 of the bill which includes some practical changes to address concerns with the current cumbersome process to abandon a contaminated well.

Preserving and protecting water quality is our ongoing mission and one that our public water supply industry takes very seriously. We are committed to working with state and federal regulators, lawmakers, environmental and watershed organizations, and the public, to ensure that our consumers will continue to have access to an ample supply of high quality water for current and future water supply needs.

The Connecticut Water Works Association, Inc. (CWWA) is an association of private, regional and municipal water supply utilities serving more than 500,000 customers, or population of about 2½ million people, located throughout Connecticut. As purveyors of public water supplies, our members have an obligation to provide sufficient quantities of high-quality water at a reasonable cost to consumers of the communities served.