



FOR THE COMMITTEE ON PLANNING AND DEVELOPMENT  
TESTIMONY OF RIVERS ALLIANCE OF CONNECTICUT RE  
*BILL 964, AAC THE SOUTH CENTRAL CONNECTICUT REGIONAL WATER AUTHORITY AND  
CONCERNING THE SALE OF WATER TO COMMUNITY WATER SYSTEMS  
And amended testimony for Bill 963, AAC The Expiration of Approvals for On-Site  
Sewage Disposal Systems with Design Flows of Less than 5,000 gpd.*

Public Hearing, March 18, 2013

To the Chairmen, Sen. Steve Cassano and Rep. Jason Rojas, and Members of the Committee:

*Rivers Alliance of Connecticut is the statewide, non-profit coalition of river organizations, individuals, and businesses formed to protect and enhance Connecticut's waters by promoting sound water policies, uniting and strengthening the state's many river groups, and educating the public about the importance of water stewardship. Our 450 members include almost all of the state's river and watershed conservation groups, representing many thousand Connecticut residents.*

Thank you for the opportunity to comment on Bill 964, concerning the South Central Regional Water Authority. I am suggesting a small change to ensure transparency. The bill expands benefits to the Regional Water Authority for "water or environmental related activities within or without the district." This is a quite broad and vague category of activities.

My particular concern is with Section 2, which inserts these activities within the list of items constituting the utility's "water supply system." Other items in that list are basically infrastructure and property rights. **All information relating to a water supply system is currently exempt from the Freedom of Information Act disclosure requirements, according to recent rulings by the Freedom of Information Commission.** Critical information about a water supply system not only *can* be kept secret when requested by a member of the public, in most cases the agencies of cognizance believe the information *must* be kept secret. For this reason, we ask that there be no inserts into the definition of "water supply system" in Section 2.

I believe the RWA can achieve its objectives without changing the definition of "water supply system."

**Amended testimony for Bill 963 re expiration of permits for onsite sewage treatment systems.**

I testified on March 11 that I could not discern what different kinds of systems were covered by this proposed bill. My friend from Durham, who testified last (right after me), said he was sure that the bill only covered conventional systems consisting of a septic tank or tanks, distribution pipes, and a leaching field. These are regulated by DPH. It might be helpful if this could be stated explicitly. There is a variety of "advanced" systems that use closed-box biological treatment of wastewater. Some of these rather delicate systems are being permitted for residences or other uses with flows under 5,000 gpd. These are still being regulated by DEEP, pending a move by DPH to write regulations for the "advanced" technology. In addition, there are communal systems of various sorts.

I understand that a complete re-do of an expired permit for a septic system might be unnecessary in most cases. I would recommend a quick review by the local sanitarian to be sure there have been no obvious changes. (For example, the site might have been mined for gravel in the meantime.) But I am happy to defer to the expertise of DPH and the Committee.

Thank you for your time and patience.

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