

•  
•  
•  
•  
•  
•  
•

3/14/2013

Re. HB 6537 *An Act Concerning Water Quality and the University of Connecticut*

Dear Co-Chairs Senator Meyer and Rep. Linda Gentile and Environment Committee Members:

I am writing **in support of House Bill 6537**: An Act Concerning Water Quality and the University of Connecticut.

This bill would require UConn to comply with certain water supply planning regulations, to provide consumer information and to meet some mapping requirements that are currently applicable to water companies and to classify certain lands of the UConn-Storrs campus for purposes of public health regulation.

Unfortunately the University of Connecticut, my alma mater, has a track record for the last decade or so of misleading the public regarding their building plans. Or, perhaps their plans have changed so often that no one could predict the current situation. Regardless of the intent, the fact is that UConn has built more buildings than it can support with the current water available in Storrs. And that it has planned to build on publicly-owned watershed property. UConn continues to build, still without a plan for how to supply water to the buildings, and still unregulated by state agencies which would no doubt have required standard checks and balances to produce more sound and environmentally sensitive assessments of UConn's plans.

The most important part of HB 6537 is the first piece, requiring UConn to comply with ("certain", but why not "all"?) water supply planning regulations. Very simply, this would require UConn to follow the laws of the state of CT, which all other water companies must follow. This is not undue or onerous or subjecting UConn to special regulation. It's a simple and fair and logical correction of an oversight.

UConn must be brought into compliance with state laws now, and without delay. The University is engaged in water planning, which is outside its jurisdiction. And, because of the funding for the Technology Park, decisions may be made quickly, yet outside of the regulatory and planning process. It's become very clear that the State Plan of Conservation and Development, a great document, has no regulatory authority. State agencies must be empowered to regulate UConn.

Senator Williams and Mansfield's Representative Haddad have supported this legislation in the past, and currently advocate creating a regional water planning authority. While a regional authority may be established at some point in the future if UConn brings water from another region to support growth in Storrs, this will be a long process. UConn and the region have a lot of long-term planning to do, which will not be fast or easy to accomplish. HB 6537 rectifies the current situation, and regulates UConn's role in planning that future growth.

The state of CT, the University of CT and the towns of Mansfield and Willimantic are not prepared to make scientifically viable, or regionally responsible recommendations for management of state water resources. All state agencies, and all stakeholders, must be included in the regional planning, and this will take time.

In 2003, your Legislative Program Review and Investigations Committee issued a Streamflow Report which strongly recommended that the state strengthen the CT Water Planning Council and create a statewide water supply planning process beyond the regional WUCC process. (In 2013, the Northeast region does not yet have a WUCC, and there is no statewide coordination.)

The Streamflow Report also points out that “The Departments of Environmental Protection and Public Health and the Office of Policy and Management are required by a 1967 state law to develop an ongoing planning process and jointly prepare and periodically update a statewide long-range plan for management of water resources.” And “The state lacks such a comprehensive, formalized water allocation process.” “ Further, the council lacks the necessary statutory authority to implement a statewide water allocation system.”

Regional, state-wide water planning needs to begin, and has been waiting for 40+ years.

This makes it more urgent that before any water decisions are made regarding UConn, the regulatory process must be changed to bring the university into compliance with all state water company laws, to empower all stakeholders to participate in the decision-making about sharing their resources, and to assess the environmental impacts of relocating water resources.

Given the lack of state and regional scientific information, it is not surprising that UConn's estimates of water “needs” change extremely frequently, sometimes almost overnight. I support the development of a water management and stewardship process that works for Connecticut.

Until that time, it is critical to pass the first part of HB 6537, by simply adding the word “Universities” to 23-32a.

Sincerely,

Jean de Smet