



**Testimony of Connecticut Fund for the Environment  
Before the Committee on Environment**

***In support of HB 6537, AN ACT CONCERNING WATER QUALITY AND THE UNIVERSITY OF CONNECTICUT.***

***In support of HB 6536, AN ACT CONCERNING GENERAL PERMITS OF THE DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION.***

***In support of HB 5480, AN ACT REQUIRING AN ASSESSMENT OF THE USE OF CERTAIN PESTICIDES AT THE UNIVERSITY OF CONNECTICUT RESEARCH FARM.***

***In opposition to SB 1019, AN ACT CONCERNING ADMINISTRATIVE STREAMLINING AT THE DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION.***

Submitted by Lauren Savidge  
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*Connecticut Fund for the Environment works to protect and improve the land, air and water of Connecticut. We use legal and scientific expertise and bring people together to achieve results that benefit our environment for current and future generations.*

Dear Senator Meyer, Representative Gentile, and members of the Committee on Environment,

**HB 6537:** Connecticut Fund for the Environment (“CFE”) submits this testimony in support of Proposed HB 6537, An Act Concerning Water Quality and the University of Connecticut. If passed, this legislation would require the University of Connecticut to comply with certain water supply planning procedures that are required of other water companies. While much of this proposed legislation focuses on land owned by UConn, this bill highlights the need for water planning throughout the state, especially in and around UConn.

We must ensure that our state has a clean and sufficient drinking water supply to meet current and future needs and keep our inland waterways healthy. Clean and safe public drinking water has been a state priority for years. Drinking water quality is directly affected by the maintenance of source water watershed lands because these lands act as natural filters, trapping sediment, chemicals and other pollutants in the water. This legislation would regulate UConn as a water company and provide the same strong source water watershed land protections, also known as Class I and Class II lands as defined in Section 25-37c of the Connecticut General Statutes.

Additionally, water supply planning must be improved throughout the state. In its 2010 report to the General Assembly, the Department of Public Health (“DPH”) stated the need for a statewide water management plan and that it would draft such a plan to address critical statewide water issues. A statewide plan is necessary to outline goals and policies to guide future development and water company projects that minimize the impact on water quality.

However, no such plan has been developed or implemented. Until a statewide water plan is created, the state drinking water supply is at risk of over-use in certain areas and abundance in others because of poor planning across the state regions. For example, there is a controversial interbasin water diversion that may be proposed that takes water from reservoirs in the Farmington River Watershed to the University of Connecticut, Storrs campus in the Thames River basin. This diversion goes against smart growth principles and pumps water into a rural area, away from the developed areas of the state.

More water management planning before large interbasin transfers take place, both around UConn and statewide, would facilitate cooperation and ensure that water supply expansions consider future impacts on the regional and overall state drinking water supply.

**HB 6536:** CFE also submits this testimony in support of Proposed HB 6536, An Act Concerning General Permits of the Department of Energy and Environmental Protection. If passed, this legislation would allow the Department of Energy and Environmental Protection (“DEEP”) to collect an annual fee for general permits.

General permit programs at DEEP are an effective means to monitor projects with environmental impacts throughout the state and grant permits in a timely fashion so regulated projects are not unduly delayed. For the general permit regulatory programs to remain effective and carry out their respective environmental goals, DEEP must have the resources to monitor compliance with the permits.

However, DEEP is an agency of limited resources. This annual fee on general permit holders would provide support to the agency to monitor compliance from the entities being regulated and receiving the benefit. The fee is minimal enough that it would not detrimentally impact regulated individuals.

**HB 5480:** Additionally, CFE submits this testimony in support of Proposed HB 5480, An Act Requiring an Assessment of the Use of Certain Pesticides at the University of Connecticut Research Farm. If passed, this legislation would protect water quality and overall public health by requiring an assessment of pesticide practices at the University of Connecticut Research Farm.

Clean drinking water is a basic human necessity and public drinking water systems must be regulated to protect and preserve the quality of drinking water for human consumption. Consuming contaminated drinking water can lead to long term and chronic health problems through waterborne diseases. Pesticides often infiltrate groundwater and can contaminate public drinking wells. It is important for UConn to assess its pesticide use and application to protect the integrity of drinking water in the area.

**SB 1019:** Finally, CFE submits this testimony in opposition to Section 14 of Proposed SB 1019, An Act Concerning Administrative Streamlining at the Department of Energy and

Environmental Protection. If passed, Section 14 of this legislation would eliminate the requirement that general permits under Section 22a-45a of the Connecticut General Statutes apply only to “minor” activities. It would also eliminate the public’s ability to access listings of general permit holders under this Section.

While general permits can be a good streamlining device, they were not designed for, and should not be applied to, major activities. If a state inland wetland project will have a significant or major impact, it should go through the full permit process that requires the state entity to submit additional information, including the need for and impact of the project. Projects that are not considered minor need to go through the full process of review to ensure they are in compliance with state law and policy and provide for full public participation.

Moreover, the public listing of general permit holders pursuant to Conn. Gen. Stat. § 22a-36 is important to inform the public of activities affecting inland wetlands and watercourses the state. It also serves as an important tool to allow regulatory agencies and citizens to track and verify compliance with the permit. Not only should DEEP be required to maintain a list of general permit holder to monitor permit holders compliance, but the list should also be available to the public to increase agency transparency.

Thank you for your time and consideration on these matters.

Sincerely,

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