



Connecticut Federation of Lakes

February 27, 2015

Officers:

Larry Marsicano
President
New Milford

Rick Canavan
Vice President
Woodstock

Anne Lizarralde
Secretary
New London

Rebekah White
Treasurer
Southbury

Directors:

George Benson
Newtown

John Burrell
Columbia

Joe Carbonell
East Hampton

Maryellen DiLuzio
Windsor

Bruce Fletcher
New Britain

Mark June-Wells
Middlefield

George Knoecklein
Mansfield

Bruce Lockhart
New Milford

Chris Mayne
Branford

John Moore
East Hampton

CFL
c/o Connecticut College
P.O. Box 5604
270 Mohegan Ave.
New London, CT
06320

HB No. 5709 AN ACT CONCERNING THE DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION'S AUTHORITY TO DESIGNATE ADDITIONAL STORMWATER SEWER SYSTEMS OUTSIDE OF URBAN AREAS

The Connecticut Federation of Lakes (CFL) is a non-profit volunteer organization that is focused on maintaining healthy lakes. Our members include residents and lake associations from across the state.

The CFL opposes HB No. 5709. This bill unnecessarily restricts the Connecticut Department of Energy and Environmental Protection (DEEP) from developing state-specific regulations under National stormwater regulations.

We are aware that many municipalities have raised concerns about the costs associated with revisions proposed by DEEP for the General Permit for the Discharge of Stormwater from Small Municipal Separate Storm Sewer Systems (MS4 General Permit). The testimony of many municipalities and the response of DEEP both acknowledge that a balance needs to be made between limited resources for municipal maintenance and our State's water resources. This has been a public dialog and has led to revisions in the proposed General Permit requirements that help find that balance (see DEEP's MS4 webpage for comments and responses www.ct.gov/deep/stormwater). This bill would end this important dialog and dictate a result that is not specific to the needs and environment of our state.

This bill specifically focuses on the 49 municipalities that would be designated Tier 2 towns under the proposed MS4 General Permit. Forcing our Connecticut regulations to National minimum standards is not the answer to the issue at hand. Rural areas of Connecticut are quite different from those in other parts of the country. Our rural roads represent a challenge for both water quality and infrastructure maintenance; however, a law that limits our ability to tailor regulations to specific community needs could have unintended environmental consequences.

Tier 2 towns contain many miles of local roads and other paved areas that can be a source of stormwater pollutants to surface waters. These areas also contain valuable surface water resources including over 32,000 acres in almost

900 named lakes, ponds and reservoirs (See attachments). Inland waters provide important recreational, environmental and economic values to our State and towns.

The degradation of inland waterbodies has significant financial implications for municipalities. Studies in Connecticut¹ and in other states² have shown that declining water quality can cause significant reductions in the value of lake area homes. An analysis in East Haddam has shown that lake residential areas contribute approximately 16% of the total town revenue.³ Approximately 27% of the lake residential contribution is due to assessor valuation factors directly associated with the aesthetic and recreational values of their lakes. Towns rely on the values of surface waters for their current finances and need to ensure that degrading water quality does not lead to declining land values.

Drinking water supply watersheds are present throughout Connecticut and especially in the rural areas that make up the Tier 2 municipalities. Pollution prevention in water supply watersheds is an important means of maintaining safe and abundant water supply for Connecticut's communities. Removing pollutants at the source can ensure that drinking water reservoirs remain clean and healthy. Once water quality is degraded, restoration is much more difficult and expensive.

We understand that municipalities face significant financial challenges. We must continue to work together toward fixing and maintaining our infrastructure while protecting our valuable water resources. This bill does not address the serious financial and environmental issues associated with water resource degradation and will result in a silence regarding stormwater issues in some CT communities. Delaying and ignoring stormwater maintenance problems will impair water quality and require more expensive solutions in the future.

¹ See Fishman, K.J., R. L. L. and F. A. Shah. 1998. Economic Evaluation of Connecticut Lakes with Alternative Water Quality Levels. Connecticut Department of Environmental Protection. <http://www.coventryct.org/DocumentCenter/View/517> and see DeLoughy, S.T. & L.J. Marsicano. 2001. Economic Evaluation of Candlewood Lake with Alternative Water Quality Categories. Candlewood Lake Authority. www.candlewoodlakeauthority.org/cla-guide#!_cla-guide/vstc22=publications/vstc0=media

² Shapiro, L. & H. Kroll. 2003. Estimates of Select Economic Values of New Hampshire Lakes, Rivers, Streams and Ponds: Phase II Report. For NH Lakes Association. www.nhrivers.org/documents/EcoStudyPhaseII.pdf

³ East Haddam Lakes Association. 2014. 2015 Fiscal Year Budget Request: Bashan Lake, Lake Hayward, Moodus Reservoir www.lakehaywardct.com/ehla.pdf

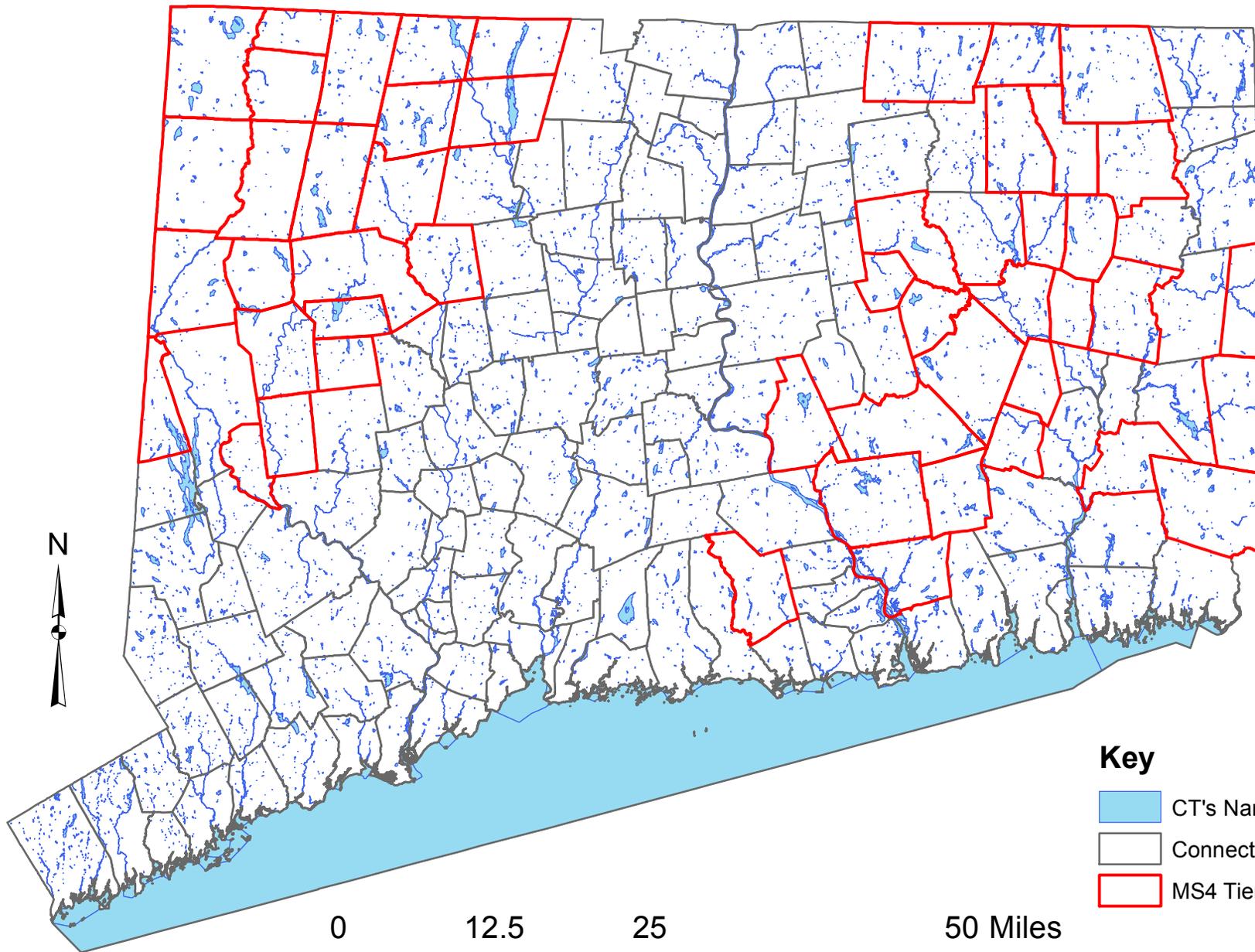
Attachment 1: Lakes, ponds, and reservoirs greater than 11 acres completely or partially located in a MS4 Tier 2 Municipality sorted by size.

Name	Acres	Name	Acres	Name	Acres
Lake Candlewood	5085.7	Andover Lake	157.5	Bronson Lockwood Reservoir	71.6
Barkhamsted Reservoir	2240.5	Riga Lake	155.1	Brewster Pond	71.2
Lake Lillinonah	1595.8	Staffordville Reservoir	149.0	Witches Woods Lake	70.4
Bantam Lake	955.4	Wood Creek Pond	147.6	Uncas Pond	69.0
Colebrook River Lake	675.7	Crystal Pond	144.7	Doaneville Pond	68.4
Lake Waramaug	640.8	Crystal Lake Reservoir	134.1	Cream Hill Lake	67.3
Washing Lake	565.3	Morris Reservoir	134.0	Dog Pond	65.8
Gardner Lake	527.3	Red Cedar Lake	132.9	Hatch Pond	65.7
Pocotopaug Lake	502.3	Reuben Hart Reservoir	126.0	Fitchville Pond	58.5
Highland Lake	448.2	North Spectacle Pond	123.2	Hampton Reservoir	58.4
Moodus Reservoir	440.7	South Pond	123.0	Mount Tom Pond	55.1
Mansfield Hollow Dam	429.5	Babcock Pond	119.9	Ashford Lake	52.6
Lake Mcdonough	385.7	Amos Lake	112.4	Lake Chaffee	52.2
Woodbridge Lake	377.9	Pitch Reservoir	111.8	Res No 4	52.0
Wangumbaug Lake	374.4	Lake Bungee	111.2	Ross Management Area Pond	50.5
Wononskopomuc Lake	348.1	Knowlton Pond	110.9	Tobey Pond	49.7
Cairns Reservoir	334.6	Natchaug River Dam	105.8	Hartland Pond	49.5
Aspinook Pond	308.9	Mono Pond	102.0	Lake Triangle	49.2
Mashapaug Pond	297.9	Indian Lake	101.5	Anderson Pond	49.2
Columbia Lake	277.3	Long Meadow Pond	101.4	Savin Lake	49.0
Rogers Lake	275.4	Wyassup Lake	98.9	Bissonnette Pond	48.5
Washinee Lake	271.3	Wigwam Reservoir	97.2	Lowrys Pond	47.3
Squantz Pond	266.8	Roseland Lake	96.4	Chapman Pond	46.6
Bashan Lake	265.5	Billings Lake	94.9	Green Fall Pond	46.1
Beach Pond	262.7	Stillwater Pond	93.5	Rugg Brook Reservoir	45.7
Williams Pond	250.3	Shepaug Reservoir	92.9	Assekong Pond	45.7
Lake Winchester	248.1	Lake Of Isles	91.2	Avery Pond	45.6
West Hill Pond	245.5	Benedict Pond	90.1	Fisher Pond	45.4
Hammonasset Reservoir	243.4	Fairy Lake	88.7	Bailey Pond	45.3
Deep River Reservoir	232.7	Wappaquasset Pond	88.2	LaFramboises Pond	45.3
Mudge Pond	211.2	Breakneck Pond	87.6	Chamberlain Pond	45.2
West Branch Reservoir	201.8	Long Pond	86.6	Bristol Reservoir No 4	42.4
North Pond	191.2	Burr Pond	83.4	Gaylord Pond	42.3
Pine Acres Lake	190.1	Halls Pond	83.2	Lake Harwinton	41.6
Crystal Lake	187.4	South Spectacle Pond	82.3	Dickinson Pond	40.5
Tyler Lake	187.2	Pickerel Lake	82.1	West Side Pond	40.4
Amston Lake	186.9	Killingworth Reservoir	80.0	Nightingale Pond	40.3
Lake Wangum	177.9	Eagleville Pond	79.5	Gritman Pond	40.0
Lake Hayward	172.4	Park Pond	75.0	Res No 2	39.7
Wononpakook Lake	167.5	State Line Pond	74.7	Whist Pond	38.7
Doolittle Lake	164.8	Black Pond	71.9	Big Pond	38.5

Attachment 1 (continued).

Name	Acres		Name	Acres		Name	Acres
Muddy Pond	38.3		Morosani Pond No 2	23.3		Loos Pond	17.1
Fuller Pond	38.1		Lewis Pond No 1	23.3		Morey Pond	16.8
Bigelow Pond	37.7		Lisbon Pond	23.3		Mohawk Pond	16.3
Griggs Pond	37.6		Lamanquis Pond	23.2		Straits Pond	16.3
Leander Pond	37.5		Glasgo Pond	23.0		Great Meadow Brook Pond	15.8
Beachdale Pond	37.3		Ford Pond	22.9		Machnik Pond	15.8
Hatchet Pond	37.3		Hanover Reservoir	22.9		Lake Floren	15.3
Barnes Reservoir	37.0		Lake Marie	22.5		Miles Pond	14.9
McDonald Pond	35.7		Spring Lake	22.4		Little Pond	14.7
Poole Pond	35.4		R. Wyant Dam	22.1		Rhode Island Ponds	14.6
Bristol Reservoir No 5	34.9		Winchester Club Pond	22.1		Lost Pond	14.6
Spalding Pond	34.5		Goss Pond	22.0		Hawes Pond	14.6
New City Pond	33.3		Ouleout Lake	21.9		Sterling Pond	14.5
Green Pond	33.0		Sessions Meadow Marsh Dam	21.6		Haviland Millpond	14.4
Hilltop Pond	32.4		Hell Hollow Pond	21.4		Howells Pond	14.3
Spencer Pond	32.3		Bog Meadow Pond	21.2		Wright Pond	14.3
Gagers Pond	32.0		Stiles Pond	21.0		Hall Meadow Brook Reservoir	14.3
Hazard Pond	31.8		Potter Pond	20.6		Quist Pond	14.2
Morey Pond	30.4		Morse Reservoir	20.4		Lake Mark	13.8
Black Spruce Pond	29.9		Leonard Pond	20.1		Crissey Pond	13.6
Tadma Pond	29.8		Lantern Hill Pond	20.1		Stowell Pond	13.6
Beardsley Reservoir	29.8		Beaver Brook Pond	20.0		Chapel Pond	13.3
Keach Pond	29.7		Hatch Pond	19.8		Douglas Pond	13.2
Norwich Pond	29.4		Northfield Pond	19.7		Pecks Meadow Pond	13.1
Lake Mauweehoo	28.6		Jones Pond	19.4		Dennis Pond	13.1
Foster Pond	27.9		Wapato Pond	18.8		Johnson Millpond	13.1
Peck Pond	27.3		Pine Meadow Park Pond	18.6		Morse Meadow Pond	13.0
Beeslick Pond	27.2		Shepherds Pond	18.4		Spaulding Pond	12.8
Wilson Pond	26.9		Kelseytown Reservoir	18.4		Zeiglers Pond	12.7
Abbotts Dam	26.2		Eel Pond	18.3		Timber Lake	12.7
Bradway Pond	25.8		Goose Pond	18.3		Kroopa Pond	12.7
Bigelow Pond	25.8		Mitchell Pond	18.0		Bevan Brothers Pond	12.5
Myers Pond	25.7		Old Man McMullen Pond	18.0		State Hospital Pond	12.5
Bantam Pond	24.7		Cranberry Lake	17.9		Armitage Pond	12.5
Long Pond	24.7		Bull Pond	17.8		Upper Pond	12.4
Lake Tavolan	24.6		Del Reeves Road Dam	17.7		Wells Pond	12.4
Buckley Pond	24.3		Nystrom Pond	17.6		Horse Pond	12.2
Cedar Lake	24.3		Beckley Pond	17.5		Wampee Pond	12.0
Upper Bolton Lake	23.5		Bristol Reservoir No 2	17.5		Upson Lake	12.0
Orcutts Pond	23.4		Hamilton Reservoir	17.5		Dickerson Pond	11.9
Corbin Wildlife Marsh Dam	23.4		Frog Pond	17.4		Ore Hill Pond	11.8

Distribution of CT Inland Waters in MS4 Tier 2 Municipalities



Key

-  CT's Named Inland Waters
-  Connecticut Municipalities
-  MS4 Tier 2 Municipalities