

**Town of Barkhamsted  
Incorporated 1779**

**Testimony of Donald S. Stein  
First Selectman, Town of Barkhamsted  
Chairman, Northwest Hills Council of Governments**

**Connecticut General Assembly Environment Committee**

**Regarding: AN ACT CONCERNING THE DEPARTMENT OF ENERGY AND ENVIRONMENTAL  
PROTECTION'S AUTHORITY TO DESIGNATE ADDITIONAL STORMWATER SEWER SYSTEMS  
OUTSIDE OF URBAN AREAS**

**February 27, 2015**

Good afternoon, Chairman Kennedy, Chairman Albis, Senator Chapin and Representative Shaban, my name is Donald Stein, and I'm the First Selectman of the Town of Barkhamsted and the current Chairman of the Northwest Hills Council of Governments, which was formed by the merger of the Litchfield Hills Council of Elected Officials and the Northwestern Connecticut Council of Governments. We are comprised of 21 communities in the northwest corner of Connecticut, most of which have populations of less than 10,000. The smallest of our members has a population of 1200 and the majority of the member towns have less than 5,000 residents.

The Northwest Hills COG and its members are extremely concerned about the imposition of this unfunded mandate, which has the potential to cost each of the small towns several hundred thousand dollars of up-front expense to purchase the equipment necessary to comply with tasks such as regularly scheduled leaf pickup, street sweeping and catch basin cleaning. This expense does not include the hiring of additional personnel, who would be needed to be compliant with the proposed requirement changes on an annual basis.

The small towns in the COG, using the Town of Barkhamsted (3800 residents) as an example, cannot afford this unfunded, significant expense and we do not see the environmental benefit of these requirements in our rural environment. We do not use sand on our roads, so roadside sweeping and catch basin vacuuming would pick up very little material. Our residents tend to blow leaves into the woods or bring them to our local transfer station for composting, so there is no real need for curbside pick-up, and the scheduling nightmare which could ensue.

To further elaborate on our concerns, Rick Lynn, our Executive Director, wrote a letter to DEEP on August 29, 2014, and I presented testimony at the DEEP public hearing, which discussed many of the concerns of the small towns in our region. I'd like to quickly summarize the key issues:

- A very small percentage of our residents have public water, relying instead on individual, on-site wells. Our rivers and reservoirs provide drinking water to cities such as Hartford, Bristol and Waterbury, and we are very protective of the quality of the water in our watersheds. In fact our watersheds are a major source of recreation, attracting visitors to the area, and are thus critical to the local economies.

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- We routinely sponsor events to help protect water quality, such as collection programs for household hazardous waste, and provide guidance to our communities and residents about good waste disposal practices.
- Our towns are quite rural, and we oppose the expansion of the MS4 provisions to rural communities that are not located within urbanized areas. This expansion is not required by the Federal EPA or the Clean Water Act.
- Instead of a major expansion in required reporting, permitting, education and enforcement, the towns would be interested in working with DEEP to instead establish guidance documents that describe appropriate control measures or ordinances, educational materials for use by our residents or Best Management Practices that could be used by the communities and its employees. Our highway departments are well-trained and we endorse continued education for these personnel.
- We do not typically have “dog parks”, and the control of pet wastes does not make sense in our rural neighborhoods, as most of our residents walk their dogs in wooded areas.

I strongly support your efforts to control the expansion of the MS4 Permit requirements, including the elimination of the Tier 2 rural communities. The requirements in the draft permit do not show any real benefit for the water sheds and rivers in the rural towns in the Northwest Hills, especially when you evaluate the cost of implementation.

Thank you for your consideration.