



**FOR THE ENVIRONMENT COMMITTEE
PUBLIC HEARING TESTIMONY OF RIVERS ALLIANCE OF CONNECTICUT
MARCH 13, 2015**

**To the Chairmen: Sen. Ted Kennedy Jr. and Rep. James Albis
And to Members of the Committee**

RB 869 AAC Establishing a Tire Stewardship Program, *support*

**PB 5406 AAC Authorizing the Increase in the Maximum Amount of Hazardous
Waste Stored at Certain Commercial Facilities, *oppose as written***

**RB 865 AAC The Allowable Costs for the Installation of Oversized Water Mains
And the Backup Wells Siting Requirements for Certain Water Company Diversions,
*oppose as written***

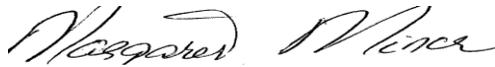
Rivers Alliance of Connecticut is the statewide, non-profit coalition of river organizations, individuals, and businesses formed to protect and enhance Connecticut's waters by promoting sound water policies, uniting and strengthening the state's many river groups, and educating the public about the importance of water stewardship.

Thank you for addressing **tire stewardship** in RB 869. The state's water bodies and wetlands are littered with discarded tires.

PB 5406 on storage of **hazardous waste** raises numerous red flags. Increasing the allowable storage quantity six-fold is a major change, and would appear imprudent even if the increase is permitted under federal law. We are a densely populated state, with considerable groundwater and soil pollution, and limited resources for inspecting hazardous waste sites and enforcing protections. If there is a true emergency and the applicability of the bill were to be limited to that emergency, of course we would reexamine the issue.

RB 856 **on water mains and water diversion** also is suspect on its face. The size of water mains is an important factor in overall water and land planning. There are a number of reasons to question an application for an oversize main. Second, the bill extends an exemption in the Water Diversion Policy Act for backup wells, that is, wells that will be brought online if a primary well fails. The bill extends the limit beyond which separate permitting is required to 700 feet from a primary well rather than the 200 feet now allowed. The 200-foot limit has been accepted because there is some validity to the view that a well at

200 feet or closer to a primary well is essentially a backup replacement drawing on the same resource, and shouldn't need new permitting. The 200-foot limit is also somewhat consistent with the public health standard for a sanitary cordon around a drinking water source. At 700 feet, the well is essentially not a backup but a new, or alternate, diversion. With statewide water planning getting underway, this is an awkward time to be considering exemptions. But again, if there is a specific emergency, we would be pleased to reconsider our position and to assist in finding a solution.



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