



**For the Planning and Development Committee
Testimony of Alicea Charamut, Executive Director
February 17, 2021**

Rivers Alliance was formed to fight for sound water policies at the state and federal levels, to provide education on water resources, and to advocate for any person or group striving to protect water. If you want clean, free-flowing and healthy rivers, and high-quality drinking water, Rivers Alliance is here to help.

Thank you for the opportunity to provide testimony on the following raised bill before you today.

**SB 1001 AAC CERTAIN SEWAGE DISPOSAL SYSTEMS AND ALTERNATIVE
SEWAGE TREATMENT SYSTEMS – OPPOSE**

I served on the Sewerage Working Group of the Commission on Connecticut's Development Future (CCDF.)

The following is the scope and charge of that working group: *PA 21-29 section 13 established a Commission on Connecticut's Development and Future within the Legislative Department, which shall evaluate policies related to land use, conservation, housing affordability and infrastructure. Existing categories of discharge that constitute (I) alternative on-site sewage treatment systems, as described in section 19a-35a of the general statutes, (II) subsurface community sewerage systems, as described in section 22a-430 of the general statutes, and (III) decentralized systems, as defined in section 7-245 of the general statutes, as amended by this act, (ii) **current administrative jurisdiction to issue or deny permits and approvals for such systems, with reference to daily capacities of such systems**, and (iii) the potential impacts of increasing the daily capacities of such systems, including changes in administrative jurisdiction over such systems and the timeframe for adoption of regulations to implement any such changes in administrative jurisdiction.*

There were several consensus recommendations that came from the Sewerage Working Group of the CCDF. The following recommendation relates directly to this proposed bill.

*"It is the recommendation of the sewerage subcommittee that there be better coordination between the DEEP and DPH" with a more specific directive to the agencies to **examine the rationale and clarify jurisdiction and enforcement authority over common ownership systems (7,500 gpd division.)***

SB 1001 undermines the work of Sewerage Working Group and bypasses the intent of the task force to bring broad stakeholders together in order to examine the barriers and provide recommendations on the utilization of various wastewater solutions. All wastewater treatment systems require some level of maintenance and oversight to ensure that ground and surface waters are not impaired by malfunction or neglect of proper maintenance. With proper oversight and regulation, alternative sewage treatment systems (ATS) could be a good solution in areas where traditional septic has or could cause impairment to our waters. But Connecticut is not there yet. DEEP and DPH need to come together to determine a pathway forward for ATS to be considered a viable tool that can be implemented in our communities.

DPH has testified numerous times that they do not have the resources to provide the oversight and regulation necessary. In responses to previous versions of this bill, DPH has testified that they have not formulated regulation, nor do they have the resources to do so. This was the laundry list of resources and staffing necessary to ensure this oversight and regulation of ATS from DPH's testimony on SB 961 from 2021:

Resources would be needed to support additional technical program engineering, management and legal staff as well as for a data tracking system to ensure proper oversight and performance of these alternative systems. Staff would also be put in place to handle the increased workload associated with large septic system plan reviews, site investigations, exception processing, regulation revisions to provide for local health official recertification, and permit reissuance. Additionally, this staff would also handle management measures for alternative on-site sewage treatment systems that include installer and operator licensure; regulation and standard development for system siting, design, installation and operation; local health official certification; enforcement; product approvals; and plan reviews as required by Section 2.

I'm happy to answer any questions that you may have Please do not undermine the work of the Sewerage Working Group of the CCDF created by this legislative body. Please do not let this bill move forward.