

For the Planning and Development Committee
Public Hearing, February 17, 2021

To Chairmen: Rep. Eleni Kavros DeGraw and Sen. MD Rahman
Ranking Members: Rep. Joseph Zullo and Sen. Fazio Ryan
Vice Chairmen: Rep. Brandon Chafee and Sen. Norman Needleman
And Distinguished Members of the Committee

From: Margaret Miner
Re: SB 1001 AAC CERTAIN SEWAGE DISPOSAL SYSTEMS
AND ALTERNATIVE SEWAGE TREATMENT SYSTEMS –

OPPOSE

Thank you for the opportunity to comment on this bill. As a matter of policy, practice, and law, the deployment and management of ATS systems has been controversial for approximately 20 years. In 2011, served as Executive Editor of *ON-SITE WASTEWATER MANAGEMENT IN CONNECTICUT: THE ROLE OF ADVANCED TREATMENT SYSTEMS (ATS)*. Funded by The Geoffrey C. Hughes Foundation. Written and/or reviewed by the ATS Ad Hoc Group, including Margaret Miner, Eric Annes, Sarah Gager, Helen Garten, Herbert Gram, Sally Harold, Richard Harris, David Potts, Catherine Rawson, Hugh Rawson, and Roger Reynolds. Published by Rivers Alliance of Connecticut.

What I learned then and that I believe to be true still now is that these stand-alone systems are often poorly understood by the buyers and even installers. It is not just that they are fairly complex mechanically, they have a biological component. They depend on the maintenance of a healthy community of bacteria. As one expert explained, "It's like buying a pet," comparable in needs to a home aquarium. The science is sound and ATS can be made to work properly, meeting standards and criteria. But to be certain that they *are* working properly requires relatively costly regular monitoring and maintenance. For this reason, creating regulations and a regulatory program has been challenging for both DEEP and DPH. The fact that there are dual authorities with a somewhat arbitrary division of responsibilities has not helped.

Public Act 21-29 created the Sewerage Working Group in the Commission Connecticut's Development Future to review and rationalize the regulatory management of ATS, certain subsurface systems, and certain decentralized systems. **The co-chairs are Sen. Christine Cohen and Donna Hamzy.** SB 1001 counters and undermines the authority of this important group created by the legislature. It flagrantly puts the cart before the horse. I strongly second the position of Rivers Alliance of Connecticut in the testimony of Alicea Charamut. This bill should not go forward.

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