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December 31, 2013

Mr. Robert Hust
Department of Energy and Environmental Protection
Bureau of Water Protection and Land Reuse
79 Elm Street
Hartford, CT 06106-5127

**Re: Stream Flow Classifications
Southeast Coastal, Pawcatuck and Thames Major River Basins**

Dear Mr. Hust:

Connecticut Water is a regulated public water utility that is committed to providing high quality water and world-class service to families and communities while being good stewards of the environment. We serve nearly 90,000 customers, or approximately 300,000 people, in 56 towns in Connecticut. Our supplies come from a mix of surface water, wells completed in bedrock and stratified drift aquifers, and water purchased from neighboring utilities. Like all water companies, our ability to adequately provide for our customers' current and future needs depends upon us having ready access to an uninterrupted supply of water.

As a public water utility with a significant presence in eastern Connecticut, we recently reviewed the proposed stream segment classifications for the Southeast Coastal, Pawcatuck and Thames Major River Basins, and offer the following comments. We are also a long-standing member of the Connecticut Water Works Association and strongly support comments submitted by the Association and its members.

Of primary concern is the apparent lack of recognition of numerous existing active, emergency and potential future public water supply wells that, consistent with regulatory intent, should not have adjacent river or stream segments classified as a Class 1 or 2. In some cases, however, river or stream segments associated with these sources appear to be classified as other than a Class 3 or 4. Examples include segment 109,002,149 (Thompson Wells, Thompson, CT); segment 109,002,787 (KIP Wells, Killingly); segments 109,003,090, 109,003,110, and 109,003,103 (Plainfield Wells, Killingly); segment 109,003,623 (Gallup Wells, Plainfield); segment 109,002,957 (Brooklyn Wells, Brooklyn); segments 109,004,008 and 109,004,007 (SDC Wells, Voluntown); segments 108,002,440 and 108,002,441 (Potential source for the Soundview System where wells have been installed and land purchased); segments 107,001,434 and 107,001,392 (Potential source for the South Coventry System where a well

has been installed and easement purchased); segments 109,002,024 and 109,002,023 (Potential source for the Thompson System where a well has been installed and an easement purchased); and segment 109,002,809, which is immediately downstream of the Chase Reservoir in Killingly, from which the Company maintains the right to withdraw water.

In some cases, existing sources do not appear to be fully accounted for when diversions are being assessed under the hydrologic stressor indexing step. For example, segment 109,003,631 is adjacent to the Gallup Wells (Plainfield), yet appears to have been assigned a numeric diversion metric of 1. While the segment's resultant classification after applying all other factors is "3", application of an accurate diversion metric suggests the segment should be a "4". Similar errors in application of the diversion metric appear to have been made; e.g., segment 109,002,150 (Thompson Wells, Thompson); segment 109,003,090 (Plainfield Wells, Killingly); segment 109,003,623 (Gallup Wells, Plainfield); segment 107,001,874 (Coventry Hills, Coventry); and segment 108,002,481 (Soundview Wells, Old Lyme). Because like errors may exist throughout the mapped basins, it is critical that DEEP verify the accuracy of its database and application of the diversion metric before adoption of any final classifications.

While we appreciate that groundwater supplies are not regulated under streamflow's enabling legislation, we are especially apprehensive about how the final river and stream classifications may affect the continuing use of public water supplies, re-permitting of existing diversions, and development of new public water supply sources. The Company maintains more than two dozen public water systems in the Thames and Southeast Coastal basins that rely in whole or in part on bedrock wells. In many if not most cases, these supplies appear located adjacent to stream segments that are preliminarily classified as Class 1 or 2. It is essential that the continued operation of these existing supplies remain unaffected by any final classification.

The Company also maintains five diversion permits in the basins that authorize the daily withdrawal of groundwater for public water supply purposes (DIV-200301917: KIP Wells, Killingly; DIV-200301962: Gallup Wells, Plainfield; DIV-199902542: Soundview Wells, Old Lyme; DIV-201104764: Point O' Woods Wells, Old Lyme; and DIV-200801624GP: Coventry Hills Wells, Coventry). In all five instances, one or more river or stream segments associated with these diversions have been preliminarily mapped as Class 1 or 2. While two of the diversions are in the process of being mapped to Level A standards (KIP and Gallup), the remaining three diversions have no such requirement (Soundview, Point O' Woods and Coventry Hills). Insofar as DEEP has indicated that stream segment classification will be a consideration in future diversion permitting and re-permitting decisions, it is vitally important that diversion permits be re-issued under like terms and conditions following classification, and that new diversions continue to be authorized when necessary and in the public interest.

December 31, 2013

CWWA's comments looked at whether the classification methodology was consistent with the regulations; whether the classifications were accurate; whether the classifications appeared to make sense; and the degree to which the classifications may impact future public water supplies and land use activities. We share the concerns raised by CWWA and believe sufficient issues have been raised that warrant DEEP taking additional time to resolve any and all questions related to the classification methodology and its application.

Connecticut Water remains supportive of new streamflow standards that adequately balance public health and the environment, and remains willing to work with the Department to ensure implementation of the regulations achieves that balance. DEEP has clearly devoted considerable effort to this initial classification phase and, issues aside, the apparent absence of any significant flow alteration in almost a third of the state's rivers and streams is encouraging.

Very truly yours,



David L. Radka

Director of Water Resources and Planning