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August 14, 2015

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

PLANNING & STANDARDS DIVISION
AUG 20 2015

**Re: Stream Flow Classifications
South Central Coastal 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 water company with a significant presence in the central shoreline area, we recently reviewed the proposed stream segment classifications for the South Central Coastal River Basins. In general, we find the preliminary classification to be fairly accurate with regard to those river and stream segments adjacent to the Company's existing or proposed public water supply sources. A few locations, however, necessitate revising in order to reflect the presence of adjacent groundwater supplies and to fully comply with the regulations. These fall into two categories: sites where active, emergency and potential future public water supply wells have adjacent river or stream segments improperly classified as a Class 1 or 2, and sites where existing sources do not appear to be fully accounted for when diversions are being assessed under the hydrologic stressor indexing step.

Three locations appear to have had adjacent segments improperly classified as other than a Class 3 or 4. These include the Westbrook Well, Westbrook (segments 104001639, 104001614, 104001619, 104001610, 104001611 and 104001686); Clinton Well, Clinton (segments 104001696, 104001700 and 104001721); and the potential future Gustafson Well, Clinton (segments 104001478, 104001475, and 104001473). Like the adjacent North Weiss site, the Company has made a significant investment in the Gustafson parcel by acquiring the property, installing test borings and performing various studies. As an aside, it appears some small segments of the Hammonasset River that lie outside the Company's mapped Level A areas or that are not otherwise associated with held-for-future-use wells, are improperly classified as automatic class 3. (See, for example, segment 104001745 south of the Rettich Wellfield, and segments 104001745 and 104001628 between the Rettich and Five Fields Wellfields.)

In addition to the stratified drift wells noted above, three water supply systems that rely solely on bedrock supplies appear to have nearby stream segments that are incorrectly classified. These include the Jensen's Beechwood (Killingworth), Green Springs (Madison) and Legend Hill (Madison) water systems. The Beechwood system utilizes three wells having a combined capacity of 0.05 million gallons per day (mgd). The preliminary diversion metric (1) for the affected stream segment (104000797) should be revised to accurately reflect the wells' presence. Similarly, the Green Springs system utilizes three wells having a combined capacity of 0.04 mgd. The adjacent stream segment (104001503) also has a preliminary diversion metric of 1 that does not appear to reflect the wells' existing diversion. Lastly, the Legend Hill system utilizes three bedrock wells having a capacity of 0.05 mgd. Downstream segments 104001259 and 104001284 have preliminary diversion metrics of 1 that also likely require revising. As noted in our earlier comments, it is important that DEEP verify the accuracy of its database and application of the diversion metric before adoption of any final classifications.

Finally, upon review of the Thames, Pawcatuck, Southeast Coast Major Basin final stream flow classifications map, it appears that numerous segments that were subsequently revised by the Department to indicate the presence of existing public water supply wells are not correctly color coded as Automatic 3s, per the intent of the mapping process. For example, segment 109002149, which is within the area of influence of the Thompson wells, indicates that a certainty factor has been met, yet the segment's final color coding is not consistent with this determination. The same is true for the KIP, Brooklyn, Plainfield, Gallup, SDC, and South Coventry (Old Eagleville Rd) wells. While we appreciate the underlying data are correct, the map associated with these and possibly other river and stream classifications should be revised to accurately reflect their true regulatory classification in order to avoid confusion and potentially placing critical public water supplies at unnecessary risk.

If you require additional information, please do not hesitate to contact me.

Very truly yours,



David L. Radka

Director of Water Resources and Planning

Cc: Lori Mathieu, DPH (scanned copy only)