



## Southeastern Connecticut Water Authority

*Water For Your Future*

BUREAU OF WATER PROTECTION AND LAND REUSE  
PLANNING & STANDARDS DIVISION

Via US Postal Service  
And Email to [deep.streamflowclass@ct.gov](mailto:deep.streamflowclass@ct.gov)

JAN 03 2014

December 30, 2013

Mr. Robert Hust  
Connecticut Department of Energy & Environmental Protection  
79 Elm Street  
Hartford, CT 06106

Re: Comments On Proposed Stream Flow Classifications

Dear Mr. Hust:

The Southeastern Connecticut Water Authority (SCWA) appreciates the opportunity to comment upon the Connecticut Department of Energy & Environmental Protection's (DEEP) "Proposed Stream Flow Classifications, Southeast Coastal, Pawcatuck & Thames Major River Basins". SCWA congratulates DEEP on the outstanding, digital mapping system it has developed, which depicts the stream flow classifications for the basins under review.

Overall, SCWA is supportive of the proposed stream flow classifications. However, it does have some concerns, as follows:

- Classifications of Future Water Supplies

The proposed classification system recognizes all existing and some potential future public water supplies. SCWA's 2003 Regional Water Supply Plan identifies potential new public water supplies and also highlights some recommended future supplies. All of these recommended future supplies are recognized in the proposed classification system. However, many suitable future sources are not recognized, including some so designated by other entities. Additionally, over time the flow characteristics of a stream may change. In light of potential changes in physical conditions and intended use there is a strong need to adopt a clear, standardized, balanced, formal mechanism to reclassify a water course. This reclassification mechanism should involve all stakeholder groups, (e.g. environmental, planning, utility and local government).
- Utilization of Classification System

SCWA is concerned that the classification system will be adopted/implemented for regulatory considerations beyond the Stream Flow Regulations; such as water resource allocation. For example, since all current and "potential sources of water supply with significant investment" are classified as "Class 3. Moderately Altered", does it follow that all other future sources of water supply will be limited to Class 3 streams including those that have been "Moderately Altered" by land use activities that could be detrimental to drinking water quality?

- No Stream Flow Class 4's Identified

No streams were identified as "Stream Flow Class 4, Altered". SCWA's concern regarding this aspect is related to the above item entitled "Utilization of Classification System". If the classification system becomes the defacto water resource allocation control, with no distinction between Class 3 and Class 4 water bodies, there would not be any regulatory distinction between streams either being "Moderately Altered" or "Altered" water sources. This could potentially limit the availability of quality water sources permissible for use for human consumption.

- Comment Period Duration

Although a significant period of time was given for receipt of public comments, SCWA recommends that the period be extended at least until May 31, 2014. In addition to the implications for the geographic area covered by this initial proposal, the adoption of any Stream Flow Classification system will impact all of Connecticut. Additional time would allow the many utilities, local governments, planning groups and others greater opportunity to fully study, comprehend, and comment upon DEEP's proposal, which potentially could have far-reaching impacts.

Thank you for considering SCWA's comments. Please do not hesitate to contact me or SCWA's general manager, Gregory C. Leonard, with any questions or comments.

Sincerely,



Dr. Edward C. Monahan, Chairman  
Southeastern Connecticut Water Authority



To: Robert Hust, DEEP  
From: SCWA  
Date: December 30, 2013

Subject: SCWA Comments On Proposed Stream Flow  
Classifications

Southeastern Connecticut Water Authority's (SCWA) comments are attached. The original comment letter has been mailed to your office.

Thank you for this opportunity to comment.

Best Regards,  
Greg Leonard