

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH

Jewel Mullen, M.D., M.P.H., M.P.A.  
Commissioner



Dannel P. Malloy  
Governor  
Nancy Wyman  
Lt. Governor

August 27, 2015

Ms. Betsey Wingfield, Bureau Chief  
CT DEEP, Water Protection and Land Reuse Bureau  
79 Elm Street  
Hartford, CT 06106-5127

Re: Stream Flow Classification Consultation, South Central Coastal Basin

Dear Betsy:

Thank you for reviewing and considering our comments dated April 30, 2015. Based on your correspondence dated May 22, 2015, the Department of Public Health (DPH) has several continuing and additional concerns regarding the approach for identification and protection of future public drinking water supplies and the administration of regulatory provisions, such as significant investment. The DPH is concerned that on a statewide, regional and local basis future sources of public drinking water that are of high quality will not be identified and therefore not protected nor preserved for public drinking water purposes. These concerns directly impact individual, regional and statewide water supply planning pursuant to Connecticut General Statutes 25-32d and 25-33h.

The DPH requests that the Department of Energy and Environmental Protection (DEEP) provide a list of sources that were not fully considered due to a lack of "sufficient locational information". The DPH continues to assist DEEP in locating or collecting missing information in an effort to improve the quality of the streamflow classification dataset. Failure to consider all potential sources will result in the inability to use high quality sources for human consumption and will impact short and long term planning efforts. Many of the potential future drinking water supplies do not have exact locations and are still deserving of protection for future use. This includes future sources that were identified by the state and protected under the State Plan for Conservation and Development since the 1980s. The DPH recommends that any potential future water supply without a specific stream segment linkage or significant investment that is listed pursuant to CGS Section 25-33q be given a streamlined 'off-ramp' if, in the future, its use becomes necessary.

DEEP's correspondence also references receiving "evidence of significant investment" for sources that are assigned a Class 3 designation. Please identify the criteria that are involved in determining whether significant investment has been demonstrated. The DPH is concerned that disregarding future sources due to perceived lack of evidence will eliminate the potential use of



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high quality sources in the future due to a class 1 or 2 designation. This level of classification will make future permitting and development of high quality sources extremely difficult and costly to pursue due to the need for a minimum stream flow classification modification as well as diversion permitting.

Further, quantification of the financial impact to public water systems may be warranted given the loss of existing current safe daily yield and future sources of supply. It is suggested that this information be gathered and shared so that the entire economic and financial impact to public drinking water statewide is understood. Significant investment in water supply planning, existing and future sources of public drinking water has taken place on an individual, regional and statewide basis over the last 40 years and has historically been supportive and protective of public health. Negative impact to that investment will potentially harm public health in the future if degraded and poor quality sources of supply must be utilized for human consumption.

Again, DPH is available to work through these critical technical issues and provide ongoing consultation for this basin and subsequent basins to be classified. Our collaboration will ensure the health and well-being of the people and natural resources of the State of Connecticut.

Sincerely,

A handwritten signature in black ink that reads "Ellen J. Blaschinski". The signature is written in a cursive, slightly slanted style.

Ellen Blaschinski, RS, MBA  
Public Health Branch Chief