

May 22, 2014

Ms. Kathryn Keenan
Legal Office
Department of Public Health
410 Capital Avenue, MS #13PHO
P.O. Box 340308
Hartford, Connecticut 06134

Subject: Written Comments WUCC Planning Process

Dear Ms. Keenan,

On behalf of the Bristol Water Department, I would like to submit this letter as written comments for consideration in the "Alteration of the boundaries of the public water supply management areas and the priorities for initiation of the Water Utility Coordinating Committee (WUCC) planning process".

The Bristol Water Department has reviewed the proposed alterations of the boundaries as indicated on the Department of Public Health map and would request that the towns of Burlington and Harwinton be placed in the "Central Connecticut Corridor" instead of the "Western Connecticut Corridor". The City of Bristol is proposed to be part of the "Central Connecticut Corridor" and the Bristol Water Department currently owns reservoirs in the towns of Burlington and Harwinton that supply water to the City of Bristol. We believe having these towns in a separate WUCC's may lead to issues in years to come when determining long range planning, water quality and available water supplies.

As stated in the Notice of Hearings, "the Commissioner of Public Health, pursuant to Conn. Gen. Sta. 25-33e(a), is required to consider the following factors" item (3) "the location of existing sources of public water supply, service areas or franchise areas". We believe that the towns of Burlington and Harwinton fall directly into this consideration requirement, since they contain existing sources for the Bristol Water Department and the fact that the Bristol Water Department has an existing service area or "franchise area" located in Burlington.

We are requesting that both towns be included in the "Central Connecticut Corridor", because in order to be a voting member in a WUCC, you must have a water system in the WUCC boundaries. If this request is simply granted for Burlington and not for Harwinton, the Bristol Water Department would not have any voting rights concerning our sources of supply in Harwinton, since we do not have a water system in Harwinton. Leaving Harwinton in the "Western Connecticut Corridor" would prevent us from voting on items that could adversely effect our water sources.

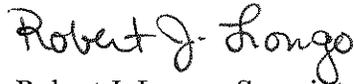
It is also our understanding from speaking with individuals involved in assigning the original WUCC boundaries, consideration was given based on Local Health Districts. Although we can not confirm that this criteria was used and even though it is not part of the statue, we do believe it should also be considered. Local Health Districts have jurisdiction over sanitary conditions in towns and can enforce code violations including septic failures. The Bristol Water Department works closely with the Bristol - Burlington Health District to assure that sanitary conditions are maintained. The Bristol - Burlington Health District covers towns that would again fall into two separate WUCC's under the proposed changes and this may pose issues down the road for both parties.

The proposed changes were discussed in great detail at the Upper Connecticut River WUCC meeting on May 1, 2014 and many other organizations, including the Farmington River Watershed Association and Town of Barkhamsted, agreed with our concerns. During the meeting, there was no opposition to our concerns indicated by any voting or non-voting member. It was voted on and unanimously approved to have a similar letter sent by the Chairman of the Upper Connecticut River WUCC to you as written comments.

It would be greatly appreciated by the Bristol Water Department if this request could be reviewed and considered in the proposed alterations.

Thank you for reviewing this request and please feel free to contact me at (860) 582-7431 if you have any questions or would like to discuss our request.

Sincerely,



Robert J. Longo, Superintendent
Bristol Water Department

Cc: Mayor Kenneth Cockane, City of Bristol
Charles Motes, Bristol - Burlington Health District
File