



CONNECTICUT DEPARTMENT OF PUBLIC HEALTH

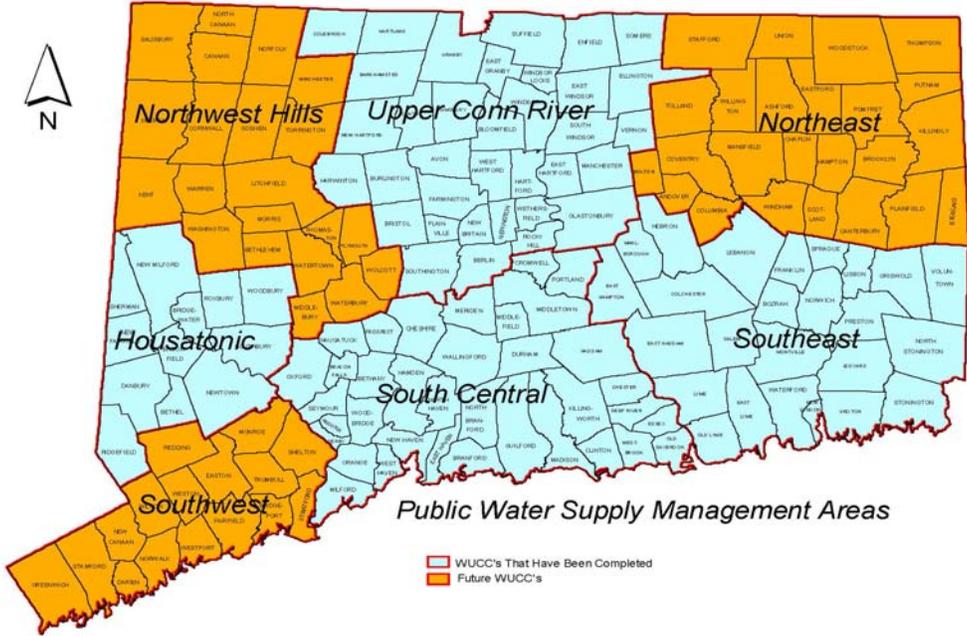
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Governor M. Jodi Rell Commissioner J. Robert Galvin, M.D., M.P.H.

ANNUAL REPORT ON THE WATER UTILITY COORDINATING COMMITTEE (WUCC) PLANNING PROCESS FOR PUBLIC WATER SYSTEMS

(PURSUANT TO CONNECTICUT GENERAL STATUTE 25-33n)

June 2009



Public Water Supply Management Areas

Legend: Light blue box = WUCC's That Have Been Completed; Orange box = Future WUCC's

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## **I) INTRODUCTION:**

Connecticut General Statute (CGS) Section 25-33n requires the Commissioner of Public Health to submit a report to the joint standing committees of the General Assembly having cognizance of matters relating to the environment and energy and public utilities. The report summarizes the status of the Water Utility Coordinating Committee (WUCC) planning process for public water systems established under Section 25-33g to 25-33j, inclusive, for the year ending the proceeding June thirtieth and efforts to expedite the completion of the process.

Water supply plans and the WUCC planning process identify potential solutions to local and regional public drinking water supply issues and assist in assuring future availability, viability, and purity of the state's public drinking water supplies. Sustainability issues, including the necessary infrastructure investments required for the state's existing large public drinking water suppliers, are also identified, scheduled and tracked within water supply plans. Long term water supply planning both at the local and regional level helps keep our state healthy and competitive in terms of attracting the new industry and businesses required to create additional employment opportunities.

Proposals for changes to the process have been submitted in this year's legislative session, thus, this annual status report has been updated with information through December 31, 2008 to assist in providing accurate up to date information to the General Assembly. Recommendations have also been included to improve, modernize, and streamline the current WUCC process. These recommendations address changes that have occurred in management area demographics, population dispersal patterns, and the water industry. Department of Public Health (DPH) staff efforts which are currently underway to implement many of these improvements to the process are also highlighted in this report.

## **II) BACKGROUND:**

A general background discussion of the history of water supply planning in CT and the current water supply planning process required pursuant to CGS 25-33g to 25-33j is provided in **Appendix 1**.

## **III) EXECUTIVE SUMMARY:**

### **A) Original Intent:**

"An Act Concerning a Connecticut Plan for Public Water Supply Coordination" (Public Act 85-535) was passed by the Connecticut General Assembly in the 1985 legislative session. The Legislature found that "in order to maximize efficient and effective development of the state's public water supply systems and to promote public health, safety and welfare, the Department of Public Health (DPH) shall administer a procedure to coordinate the planning of public water supply systems." The act provides for a coordinated approach to long-range water supply planning by addressing water quality and quantity issues from an area-wide perspective. The process is designed to bring together public water system representatives and regional planning organizations to discuss long-range water supply issues and to develop a plan for dealing with those issues. This legislation was intended by the General Assembly to assure the availability and purity of the state's public drinking water supplies for all residents.

The Water Utility Coordinating Committee (WUCC) planning process supplanted several failed attempts in CT, as recommended by several boards, commissions, task forces, etc.; to enact water supply planning and policy which date back to the 1920's. Each of these previous attempts (State Water Commission 1925-1957, Water Resources Commission 1957-1971, Interagency Water Resources Planning Board 1967) to enact state water supply planning always followed severe droughts in CT and then was oft forgotten and failed when each drought had passed. Drought returned again in 1980-1981 and the Water Resources Task Force (WRTF) was enacted by the legislature and tasked with issuing a report with recommendations that would assure the availability and purity of the state's public drinking water supplies for all residents. The WRTF met from 1982-1984 and issued their report in 1985 that would lead to the WUCC water supply planning process.

The WUCC planning process delineates the state into seven geographical areas based upon the following:

- similarity of water supply problems in proximate areas
- population density and distribution
- the location of existing sources of public water supply
- service areas or franchise areas
- existing interconnections between public water systems
- municipal and regional planning agency boundaries
- natural drainage basins
- topographic and geologic characteristics

Each public water system serving greater than 1000 persons within the delineated geographical area is required to prepare an individual water supply plan every five years. The WUCC management areas are required by CGS Section 25-33h to create a coordinated regional water supply plan which was intended to be updated every ten years. The original concept was for a grass roots community based planning process to allow for a consolidated, cost effective approach to problem resolution.

A companion process, CGS 16-262m: Certificate of Public Convenience and Necessity (CPCN), was similarly created over concerns regarding the viability of undercapitalized, inadequate water systems and to eliminate the proliferation of small water systems henceforward. The CPCN process was intended to dovetail with the efforts of the WUCC and water supply planning process to create an orderly expansion of water supply service in all geographic regions of CT and not allow the continued creation of new, small public water systems that were undercapitalized.

Shortly after the first three WUCC areas were convened in the late 1980's, the General Assembly passed PA 89-327, An Act Establishing a Water Resources Policy. The Act stated the following to be state goals and policies:

- To preserve and protect water supply watershed lands and prevent degradation of surface water and ground water
- to protect groundwater recharge areas critical to existing and potential drinking water supplies
- to make water resources conservation a priority in all decisions
- to conserve water resources through technology, methods and procedures designed to promote efficient use of water and to eliminate the waste of water
- to prevent contamination of water supply sources or reduction in the availability of future water supplies
- to balance competing and conflicting needs for water equitably and at a reasonable cost to all citizens
- to reduce or eliminate the waste of water through water supply management practices
- prevention of degradation of surface water and groundwater
- protection of groundwater recharge areas critical to existing and potential drinking water supplies
- make water resources conservation a priority in all decisions

This legislation further enacted revisions to CGS Section 25-32 to institutionalize each of these state goals and policies concerning water resources within the water supply planning process with the exception of balancing competing and conflicting needs for water.

**B) Current Status:**

Major changes in Connecticut have occurred since the mid 1980's in the water industry and population pattern changes, including major population dispersal to suburbs. Historically, public water infrastructure was created to serve the larger populations of cities and industrial centers in CT with the sources of supply remotely located in outlying areas and piped for miles to water treatment facilities. Living in

larger, more spaced out areas in the suburbs makes public services, including water, more expensive. The cost of water service can become even more expensive when the need for this public service is not openly discussed, resolved, and cost shared on a regional basis as the current WUCC process intended.

The Housatonic, South Central, Upper Connecticut, and Southeast WUCC areas have been convened to date, but only the Southeast regional WUCC coordinated plan has been approved by DPH. The Southeast WUCC approved regional coordinated plan is also an example of the effective regional solutions possible when neighboring communities and public service utilities partner in an open, transparent process that seeks to find solutions for all parties. The SEWUCC members of Groton, Ledyard, Montville, Norwich, New London, Waterford, and the Mohegan Tribal Nation all worked together in an open, transparent process which resulted in the construction of the Southeast Regional Pipeline, a major regional system to convey safe and reliable public water service to these communities in a cost effective manner.

The Northeast, Northwest Hills, and Southwest WUCC areas have not been convened to date, thus, no Exclusive Service Area (ESA) providers exist for responsible ownership or operation of newly created public water systems in these areas of the state. The two fastest growing WUCC areas in CT in terms of adding new small public water systems are the Northeast and Northwest WUCC areas. One hundred and thirty-six (136) new small public water systems have been added statewide from 2005-2008.

### **C) Critical Needs/Current Activities:**

A need exists to assign Exclusive Service Area (ESA) providers in the Northeast, Northwest Hills, and Southwest WUCC management areas. The Certificate of Public Convenience and Necessity (CPCN) process for the creation of new public water systems adds to the urgency to assign ESA providers for these remaining WUCC management areas to ensure the orderly creation of public water infrastructure. The CPCN process requires developers to work with ESA providers, where assigned, when creating new public water systems to ensure the long term reliability and viability of public water systems.

Regular grass roots WUCC meetings will be held again in 2009 for all convened management areas to discuss updating regional plans and solicit member input regarding regional water supply planning and solutions to known problems. It is critical that routine WUCC meetings are held in all management areas to ensure continuity of the process and area wide problems that still require resolution.

DPH will also sponsor regional forums in 2009 in the three management areas yet to be convened. These regional forums are intended to apprise chief elected officials, regional planning officials, local health directors, and Community public water systems of the history of the WUCC process, the relevance and importance to their communities, and upcoming new mandates. The forums will also have participants from past convened WUCC management areas give presentations and offer guidance based upon their own experiences and what worked well for their communities. Input from local officials will also be sought at these forums for recommended revisions to the process to better suit their respective communities in ensuring an adequate supply of water for all residents. The first regional forum has been scheduled for the Northeast management area and will be held July 14, 2009 in Ashford at the Knowlton Memorial Hall auditorium.

A Commissioner's WUCC Advisory Committee, initially comprised of existing statewide WUCC Chairpersons, will be offering recommendations on necessary changes to the water supply planning and WUCC process. It is expected this WUCC advisory committee can also offer guidance to the individual WUCC management areas and help to promote consistency across management areas. Additional representatives for the Commissioner's Advisory Committee will also be solicited at the regional forums for the WUCC management areas yet to be convened to ensure fair and equal representation for all geographical regions of the state.

#### **IV) CURRENT STATUS OF WUCC MANAGEMENT AREAS:**

##### **1) HOUSATONIC WUCC:**

**Housatonic Member Towns: Bethel, Bridgewater, Brookfield, Danbury, New Fairfield, New Milford, Newtown, Ridgefield, Roxbury, Sherman, Southbury, Woodbury**  
**Housatonic Member Regional Planning Organizations: Council of Governments of the Central Naugatuck Valley, Housatonic Valley Council of Elected Officials, Northwestern Connecticut Council of Governments**

The Housatonic Water Utility Coordinating Committee (HWUCC) met on November 6, 2008 for the first time in over three years. DPH called the meeting to reinvigorate the original participants, introduce new water supply planning and WUCC initiatives, present the new management team of the DPH Drinking Water Section (DWS), and introduce the new supervisor and staff members of the DWS Planning Unit. A presentation derived from the initial Housatonic WUCC coordinated regional water supply plan was given by DPH staff at the meeting. The meeting attendees responded positively and were genuinely surprised to find out the DPH presentation was culled from the regional water supply solutions offered in their own coordinated regional plan from 1988. The coordinated regional plan hit upon several key issues and potential solutions that are still relevant today, twenty years later.

It was evident that the regional plan crafted by the original Housatonic WUCC participants in 1988 had been long forgotten and set aside due to conflicting priorities, loss of participant legacies; and the inability of water companies to work together, communicate effectively, and engage local political leaders to enact solutions to the longstanding water supply issues in this region. It is imperative for the HWUCC leadership and members to become more active in promoting regional water supply solutions. Regular meetings of the HWUCC in 2009 will foster help communication, bridge gaps not considered by previous WUCC participants, and ensure continued discussions concerning regional water supply issues.

Major challenges in the Housatonic WUCC management area include the immediate need for new sources of supply at Danbury Water Department, United Water-CT New Milford Division; Heritage Water-Southbury; and in the Towns of Brookfield and New Fairfield. This WUCC management area currently has the most pressing need in the state for additional sources of supply and public health, safety, and economic development all will be affected if regional partners can not work together to bring additional supply into the area. Working together and with municipal leaders to craft a regional solution to resolve water supply issues/needs in Bethel, Brookfield, Danbury, New Fairfield, New Milford, Newtown, Ridgefield, and Southbury is the major challenge facing the water suppliers in the this management area. The vast majority of the municipalities within the Housatonic WUCC management area would benefit greatly from the resolution of this current water availability problem. One possible regional option would be to connect Danbury Water Department as a regional hub for water supply in the Housatonic area to Aquarion of CT whose water mains are currently located approximately one half mile away on Route 7 in Ridgefield. A good start to a regionalized water system was initiated by United Water-CT with the purchases of Bethel Consolidated and Greenridge Tax District water systems.

Naturally occurring radioactive contaminants are also present in areas within Brookfield, Newtown, and Ridgefield; and known contamination areas exist in Brookfield, New Milford, Ridgefield, Bethel, New Fairfield, Newtown, Southbury, and Woodbury. Sixteen (16) new small public water systems were added in the HWUCC over the past four year period and only two are owned and operated by ESA providers. DPH will continue the renewed efforts to educate ESA providers on the importance of providing adequate service within their assigned exclusive service areas. ESA providers also need to improve communication and working relationships with municipal officials to ensure water service availability to meet the needs of the community or DPH may start receiving requests to consider the reassignment/realignment of these existing assigned service areas.

## **2) SOUTHEAST WUCC:**

**South East Member Towns: Bozrah, Colchester, East Haddam, East Hampton, East Lyme, Franklin, Griswold, Groton, Hebron, Lebanon, Ledyard, Lisbon, Lyme, Marlborough, Montville, New London, North Stonington, Norwich, Old Lyme, Preston, Salem, Sprague, Stonington, Voluntown, Waterford**

**South East Member Regional Planning Organizations: Capitol Region Council of Governments, Connecticut River Estuary Regional Planning Agency, Midstate Regional Planning Agency, Southeastern Connecticut Council of Governments, Windham Regional Council of Governments**

The Southeast Water Utility Coordinating Committee (HWUCC) met on September 15, 2008 for the first time in three and one half years. DPH called the meeting to reinvigorate the original participants, introduce new water supply planning and WUCC initiatives, present the new management team of the DPH Drinking Water Section (DWS), and introduce the new supervisor and staff members of the DWS Planning Unit.

The WUCC members also heard an Exclusive Service Area (ESA) dispute for a proposed development in East Hampton. The parties involved in the dispute were the Town of East Hampton Water Pollution Control Authority (WPCA), the current ESA provider, and Pelletier Builders, the developer for the project. Both parties presented their arguments to the WUCC followed by discussion among the WUCC membership. Following no clear cut consensus from the membership on the dispute, SEWUCC Co-Chairs Bob Congdon, First Selectman of Preston, and John Bilda, Norwich Public Utilities, remanded both parties to come before the Co-Chairs to resolve their differences in a private meeting within one week. Failing that, another SEWUCC meeting would be scheduled and the measure would be put forth to a formal vote of the WUCC membership for resolution. The differences of the two parties were resolved in the private meeting with Co-Chair Congdon. The Town of East Hampton remained the ESA provider willing to own and operate the final completed water system for the development.

It is critical that the Southeast WUCC become active in assisting to promote regional solutions. Some smaller communities in the region have struggled with major water supply issues such as creating a town wide water system in East Hampton to resolve several contamination issues and continued efforts to ensure the Town of Sprague has a viable water supply system. The Town of East Lyme also struggles every year to meet the peak demands of their customer base during the summer tourism months due to a lack of available supply. A very positive meeting occurred on January 14, 2009 in East Lyme when First Selectman Paul Formica and the Town of East Lyme sponsored a special meeting to discuss regional water supply solutions that was very well attended and positively received by the participants. The critical importance of a well balanced regional system with adequate redundancy was borne out by the significant impacts to several of the major water suppliers in the SEWUCC region including the City Of Norwich, City of New London, and Aquarion Water Company-Mystic Division during the drought advisory of September 2007-January 2008. All of these major suppliers were at the point of requesting approvals for implementation of significant emergency measures if the drought had persisted.

Seventeen (17) new small water systems were created or discovered in this region over the past four year period, only one of which is owned and operated by an exclusive service area provider. Again, this proliferation of small water systems in CT was intended to be eliminated by the WUCC process. DPH will continue to call meetings of the SEWUCC in 2009 to address regional cooperation and small system proliferation. DPH staff resources were also devoted to providing technical assistance to the Town of Hebron in creating a town center water system to resolve several outstanding contamination issues and to promote development in the business district, the Town of East Lyme in resolving their chronic water shortages, and the Town of Sprague to remain a viable water system.

Major challenges include immediate need for new sources of supply at East Hampton, East Lyme, New London, Norwich, Old Lyme, and Sprague; major water infrastructure needed in East Hampton and Old Lyme; and known contamination areas in East Haddam, East Hampton, Hebron, Marlborough, Montville, and Salem. This WUCC management area would benefit from additional expansion of the current Southeast Regional Pipeline to add East Lyme and possibly Sprague.

### **3) SOUTH CENTRAL WUCC:**

**South Central Member Towns: Ansonia, Beacon Falls, Bethany, Branford, Cheshire, Chester, Clinton, Cromwell, Deep River, Derby, Durham, East Haddam, East Haven, Essex, Guilford, Haddam, Hamden, Killingworth, Madison, Meriden, Middlefield, Middletown, Milford, Naugatuck, New Haven, North Branford, North Haven, Old Saybrook, Orange, Oxford, Portland, Prospect, Seymour, Wallingford, Westbrook, West Haven, Woodbridge**

**South Central Member Regional Planning Organizations: Connecticut River Estuary Regional Planning Agency, Council of Governments of the Central Naugatuck Valley, Midstate Regional Planning Agency, South Central Regional Council of Governments, Valley Council of Governments**

The South Central Water Utility Coordinating Committee (HWUCC) met on December 8, 2008 at Connecticut Water Company's main office in Clinton. DPH called the meeting to reinvigorate the original participants, introduce new water supply planning and WUCC initiatives, present the new management team and section organization of the DPH Drinking Water Section (DWS), and introduce the new supervisor and staff members of the DWS Planning Unit. The meeting was well attended by chief elected officials and local health officers. A special invitation was provided from DPH to local chief elected officials and health districts for this meeting to encourage participation in this process. The new attendees contributed significantly to the meeting and brought to light real local water supply issues from their communities. This interaction between ESA providers, drinking water professionals, and local officials in resolving local problems was the original intention of the WUCC process.

DPH staff gave a presentation that was derived from the initial South Central WUCC coordinated regional water supply plan. The meeting attendees responded positively to the DPH presentation and were again genuinely surprised to find out that the presentation was culled from the highlights and regional water supply solutions offered in their own coordinated regional plan. The coordinated regional plan hit upon several key issues and possible solutions that are still relevant today, eighteen years later. It was evident that the regional plan crafted by the original South Central WUCC participants in 1990 had also been long forgotten and set aside due to conflicting priorities, loss of participant legacies; and the inability of water companies to work together, communicate effectively, and engage local political leaders to enact solutions to the longstanding water supply issues in this region. DPH will continue to call meetings of the SCWUCC in 2009 to continue discussions concerning regional water supply issues, foster communication, and bridge gaps that may not have been considered by previous WUCC participants.

Twenty-one (21) new small public water systems have been created in the SCWUCC over the past three year period, none of which are owned and operated by an exclusive service area provider. It is imperative for the SCWUCC to ensure this proliferation of small water systems does not continue to occur and water service is provided by exclusive service providers wherever practical. The approach to providing much better service to claimed Exclusive Service Areas must include investigation of regional solutions or consideration to reassignment of areas currently being underserved by the ESA provider needs to occur.

Other major challenges include the immediate need for new sources of supply at Middletown Water Department and Oxford (Heritage Water); naturally occurring radioactive contaminants in Madison and Killingworth; and known contamination areas in Durham, East Haddam, and Haddam. This WUCC management area could benefit greatly from a regional solution to resolve water supply issues/needs in Durham stemming from multiple known contamination sites.

#### **4) UPPER CONNECTICUT RIVER WUCC:**

**Upper Connecticut River Member Towns: Avon, Barkhamsted, Berlin, Bloomfield, Bristol, Burlington, Canton, Colebrook, East Granby, East Hartford, East Windsor, Ellington, Enfield, Farmington, Glastonbury, Granby, Hartford, Hartland, Harwinton, Manchester, New Britain, Newington, New Hartford, Plainville, Rocky Hill, Simsbury, Somers, South Windsor, Southington, Suffield, Vernon, West Hartford, Wethersfield, Windsor, Windsor Locks**

**Upper Connecticut Member Regional Planning Organizations: Capitol Region Council of Governments, Central Connecticut Regional Planning Agency, Litchfield Hills Council of Elected Officials**

The Upper Connecticut River Water Utility Coordinating Committee (UCRWUCC) held one meeting on April 8, 2008. This meeting addressed several “house keeping” issues, but no substantive long term coordinated planning. A request for a change in Exclusive Service Area (ESA) boundaries by the Manchester Congregation of Jehovah’s Witnesses Inc. located at 214 New Bolton Road in Manchester, CT to construct a new PWS at their site was unanimously approved.

Ten (10) new public water systems were created or discovered in the Upper Connecticut River WUCC over the past four year period. Water issues faced in the region are drought advisories in Manchester and New Britain and the pressing need for public water service along the business section of Route 44 (Albany Turnpike) in Canton.

#### **5) NORTHEAST WUCC:**

**Northeast Member Towns : Andover, Ashford, Bolton, Brooklyn, Canterbury, Chaplin, Columbia, Coventry, Eastford, Hampton, Killingly, Mansfield, Plainfield, Pomfret, Putnam, Scotland, Stafford, Sterling, Thompson, Tolland, Union, Willington, Windham**

**Northeast Member Regional Planning Organizations: Capitol Region Council of Governments, Northeast Connecticut Council of Governments, Windham Regional Council of Governments**

The Northeast WUCC (NEWUCC) has yet to be convened despite final legislation for the water supply planning process being passed by the legislature in 1985. Exclusive Service Area (ESA) providers do not exist to serve these towns to ensure responsible ownership or operation of newly created public water systems. This region of the state has also seen the most growth in terms of adding new small public water systems with thirty-three (33) systems added over the past four year period. The failure to have convened the NEWUCC has created a serious disconnect with the CPCN process which requires ESA providers to own newly created public water systems. The failure to have designated Exclusive Service Area (ESA) providers in this portion of CT may have a serious effect on orderly expansion of public water infrastructure and result in duplication of service at a much higher cost in the long term for the residents of these towns. Considerable technical assistance over the past few years was provided by DPH staff to the University of Connecticut and the Town of Willington to help ensure orderly growth with proper water service. The Towns of Andover, Columbia, Coventry, and Mansfield are at the point of facing similar development challenges now. The first regional forum for WUCC management areas yet to be convened has been scheduled for the Northeast WUCC management area and will be held July 14, 2009 in Ashford at the Knowlton Memorial Hall auditorium.

Other major challenges include the immediate need for new sources of supply at Putnam Water Department and the University of Connecticut, naturally occurring radioactive contaminants at Johnson Memorial Hospital in Stafford, and known contamination areas in Ashford, Coventry, Killingly, Mansfield, Plainfield, Putnam, Stafford, Sterling, Willington, and Windham. This WUCC management area could benefit greatly from regional solutions to resolve water supply issues/needs in Coventry, Mansfield, and Putnam. One possible regional option could come from Windham Water Works which currently has additional margin of safety and available water to assist regionally.

**6) NORTHWEST WUCC:**

**Northwest Member Towns: Bethlehem, Canaan, Cornwall, Goshen, Kent, Litchfield, Middlebury, Morris, Norfolk, North Canaan, Plymouth, Salisbury, Sharon, Thomaston, Torrington, Warren, Washington, Waterbury, Watertown, Winchester, Wolcott**

**Northwest Member Regional Planning Organizations: Central Connecticut Regional Planning Agency, Council of Governments of the Central Naugatuck Valley, Litchfield Hills Council of Elected Officials, Northwest Connecticut Council of Governments**

The Northwest WUCC (NWWUCC) also has yet to be convened, thus, no Exclusive Service Area (ESA) providers exist to serve these towns to ensure responsible ownership or operation of newly created public water systems in this area of the state. Twenty-four (24) small public water systems have been added in this region of the state over the past four year period. This number of new PWS makes the NWWUCC the second fastest growing section of the state in terms of adding small public water systems. This WUCC needs to be convened so ESA providers can assume responsibility for proper ownership, management, and maintenance of the many small public water systems being created in this area and to ensure orderly expansion of public infrastructure.

DPH has provided considerable technical assistance, including sponsoring two regional forums in the Middlebury area, to ensure proper water service to this fast growing area which does not have the benefit of a convened WUCC and ESA providers. The Northwest WUCC management area will benefit shortly from an ongoing regional solution which will install regional pipelines to connect Heritage Water in Southbury with Connecticut Water Company in Middlebury which is already connected to Waterbury Water Department, a major regional water supply.

**7) SOUTHWEST WUCC:**

**Southwest Member Towns: Bridgeport, Darien, Easton, Fairfield, Greenwich, Monroe, New Canaan, Norwalk, Redding, Shelton, Stamford, Stratford, Trumbull, Weston, Westport, Wilton**

**Southwest Member Regional Planning Organizations: Greater Bridgeport Regional Planning Agency, Housatonic Valley Council of Elected Officials, South Western Regional Planning Agency, Valley Council of Governments**

The Southwest WUCC also has yet to be convened, thus, no Exclusive Service Area (ESA) providers exist in these communities. Exclusive Service Area (ESA) providers are required to ensure responsible ownership or operation of newly created public water systems and also assist in ensuring orderly development of public water supply in communities.

Five (5) new small public water systems have been added over the past four year period in the Southwest management area, none of which are owned or operated by ESA providers due to failure to convene this management area. Other immediate needs are additional supply, new water system infrastructure, treatment plant upgrades, additional storage facilities, and water main replacement to eliminate “bottlenecks” in the distribution system at Aquarion Water of CT-Greenwich Division.

**V) WATER PLANNING COUNCIL:**

Public Act 01-177, as modified by Public Act 02-76, established the Water Planning Council (WPC) to address issues pertaining to Connecticut’s water resources and identify any overlap that may exist between state agencies in regards to regulating water resources. The WPC has recognized the need to review relevant existing legislation and regulations for the purpose of proposing constructive legislative changes to ensure adequate water supply planning, responsible growth, water allocation, diversion permit issues, and minimum stream flow standards to support biodiversity. Among the items the WPC has identified as requiring attention is the need to revisit procedures for coordination of public water supply

planning. The following issues regarding the WUCC planning process have been raised to the WPC:

- **Changes to Existing WUCC Management Areas:** A mechanism needs to be developed to consolidate the existing public water supply management areas. Given the changes that have taken place in Connecticut and the water industry over the past twenty years, the planning process would be more effectively served by consolidating the current structure of seven areas into a more manageable structure of three or four areas based upon similar water supply issues. *DPH will facilitate this issue by convening a Commissioner's Advisory Committee, initially comprised of existing statewide WUCC Chairs, to make recommendations on potential revisions to the existing WUCC management areas and how to best incorporate the areas yet to be convened into the existing process. The DPH will also sponsor regional forums in 2009 in the three management areas yet to be convened. These regional forums are intended to apprise chief elected officials, regional planning officers, local health directors and Community public water systems of the WUCC process and to seek their input for necessary changes to the process that may suit their respective communities in ensuring an adequate supply of water for all residents. The first regional forum has been scheduled for the Northeast management area and will be held July 14, 2009 in Ashford at the Knowlton Memorial Hall auditorium. Additional representatives for the Commissioner's Advisory Committee will also be selected at the regional forums to ensure fair and equal representation to all management areas in the state.*
- **Incorporation of Environmental Interest Groups to Existing WUCC Membership:** Environmental groups, such as Rivers Alliance, have also expressed an interest in participating in this planning process. This participation could be allowed now with the concurrence of the existing WUCC management area membership by revising their respective operating rules. *DPH recognizes and supports the need to have participation from the environmental groups in the WUCC process, but not as full voting members in the process. The environmental groups can add valuable input to the WUCC process in matters of items of discussion and water resources policy, however, only affected members of the management area served should be allowed voting privileges.*
- **Consistent and Uniform Operating Procedures:** Procedural guidelines for the WUCC management areas should be provided to the WUCC management areas to make the process more efficient and uniform across management areas. *DPH will facilitate this issue through the Commissioner's Advisory Committee and make recommendations on necessary changes to the process and how to promote consistency and procedural guidelines across the WUCC regions.*
- **Exclusive Service Area Revisions:** Each WUCC has labored over establishing and making revisions to exclusive service areas. The later has occurred in Durham/Middlefield, Burlington/Harwinton, and Brookfield. The process for establishing exclusive service areas and making revisions to existing exclusive service areas should be examined and revised as necessary. *DPH will facilitate this issue through the Commissioner's Advisory Committee and make recommendations on a process to revise existing service areas. Recommendations will also be made to ensure existing service providers properly service claimed service areas or relinquish areas in which the ESA provider has not made significant strides in ensuring necessary water service is made available to the community.*
- **Incorporation of Municipal Officials to Existing WUCC Membership:** Many municipalities have expressed a desire to be designated as official members of the WUCC. Currently, some have been recognized as members by virtue of their ownership of a public water system and

others could only participate as non-members without any voting rights. Municipal officials have not always participated in the process, when not given official membership status, and regional planning agencies have not always represented each municipality as thoroughly as necessary. Municipal officials need to be recognized and given official WUCC membership status. *DPH also recognizes the need to have chief elected officials (or their designee) and local health directors participate as WUCC members with full voting privileges. A special invitation was provided to local chief elected officials and health districts for the 2008 South Central WUCC meeting to encourage their participation in the WUCC process. These new attendees significantly contributed to the meeting and brought to light real local water supply issues from their communities. This interaction between ESA providers and local officials to help solve local problems with the professional experts is what was originally intended for in the WUCC process. It remains now to integrate these new participants as official WUCC members with full voting privileges which can be accomplished by revising the rules and operating procedures of the existing WUCC management areas.*

- **WUCC Membership Definition:** The current WUCC membership definition includes all public water systems, which serve 25 or more people or have 15 or more service connections, and regional planning agencies. The WUCC legislation, when written in February 1985, initially recognized only the 700 community public water systems regulated by DPH. Since that time the DPH has identified and now regulates thousands of non-community public water systems. The current number of public water systems in Connecticut is approximately 3,000 (community and non-community public water systems). Logistically these numbers represent too large a group to participate in the planning process. The level of participation and role of various stakeholders in the process needs to be revised. *DPH recognizes that Non-Community PWS were never intended to be involved in this process nor do they have the financial, managerial, or technical ability to be considered as potential solutions to regional water supply issues.*
  
- **Assignments of Exclusive Service Areas for Public Water Systems with Water Supply Plans in growth areas based on 5, 20 & 50 year planning periods (updated every 5 yrs), and Exclusive Service Areas for satellite management:** The Department of Environmental Protection (DEP) has raised issues involving the assignment of exclusive service areas in relation to water allocation and DEP's diversion process. *DPH recognizes the connection between water supply plans, Exclusive Service Areas, diversion permits, water allocation, and potential future minimum stream flow requirements in CT. With those connections in mind and the importance of working together as state agencies involved in water resources, the DPH Planning Unit undertook a massive data collection project from the most recently approved water supply plans during 2008. Staff pulled together individual water company, regional, and statewide data on safe yield, available water, margin of safety, and potential new sources. This data is critical information necessary to begin discussions on diversion permits, water allocation, and potential future minimum stream flow requirements and their connection to water supply planning.*

## **VI) DISCUSSION:**

The WUCC planning process has received a certain amount of criticism over the years due to water supply problems in several communities which the process and its participants at that time were not able to resolve. Unfortunately, as with any process, the process is only as good as the belief in the process by the participants and their use of effective, transparent, and open communication. The WUCC planning process was designed to be an interactive, transparent, consensus building process that was charged with finding regional solutions to local problems. The timing and current conditions in society have never been more opportune than now for this interactive, regional solution based process to be successful. A WUCC

planning process that is successful will also move CT ahead of its regional competitors in the terms of the water infrastructure necessary to attract and retain good jobs through new industry and businesses.

It has, however, been twenty-four years since the original legislation passed in 1985 and the process would benefit from some revisions, modernization, and a fresh outlook. With this in mind, DPH has appointed a new management team in their Drinking Water Section and a new supervisor in the Planning Unit with a proven track record of community achievements through consensus building, teamwork, and regional solutions. New staff members have also been hired to work in the Planning Unit who have brought a new wave of enthusiasm and positive mindset to the WUCC process at the state level.

The current process does need to be made more efficient and responsive to local and regional needs. The addition of chief elected officials and local health directors to the WUCC voting membership will further allow for more effective problem solving. It also will result in readily available local leaders who understand the technical issues and can assist in tackling the financial issues required for regional projects. By enacting these small changes and additions to the WUCC membership rolls, the process can be an effective tool for change in problem areas seeking unique solutions or facing unanticipated problems. DPH added a special mailing to invite chief elected officials and health directors to the final WUCC meeting held in 2008 at the South Central WUCC. The response for a first effort at outreach to these local leaders was excellent. These new additions to the WUCC process carried the South Central WUCC meeting at several points and brought their local issues to the service area providers looking for solutions and advice. This local element was how the WUCC process was intended to work in engaging the proper entities necessary to implement solutions to unique water supply issues.

The WUCC planning process was not created to fund projects and finding adequate resources to serve these WUCC management areas is very difficult without sufficient funding. Finding adequate water resources and the financial support necessary to create, or expand, public water service infrastructure is often a very difficult challenge. All delineated water supply management areas would now benefit from updated WUCC plans and subsequent regional solutions that may become available to resolve longstanding problems. Only through an interactive, transparent, consensus building process, like a fully functioning engaged WUCC, will all the problems in a region be openly and honestly aired in a public forum once a bond and trust factor is built among participants. The private, rate regulated public water systems must engage decision makers at the Department of Public Utility Control and works towards a mechanism that allows the private companies to participate in regional solutions in a manner that allows these companies to recoup their original investments.

Changes still necessary for consideration to improve the current WUCC process include:

- Creating a mechanism to allow for consolidation of existing Public Water Supply Management Areas.
- Addressing the obstacles (financial, staffing and regulatory) that limited the completion, approval and/or updates of the WUCC regional plans.
- Establishing the level of participation of various stakeholders in the process.
- Providing procedural guidelines for WUCC management areas to make the process more efficient and allow a convening WUCC to benefit from previous WUCC management area's experiences.
- Revising the general process by which exclusive service areas (ESA) are established and conflicts are resolved.
- Creating a mechanism to ensure consistency between claimed exclusive service areas and water supply plans.

The general public also needs to have a better understanding of the state's water resources and conservation methods. The underlying problem with improving Connecticut's water resources planning process is the difficulty of gaining a consensus to solve a problem that many do not yet recognize as a

problem. The American Water Resources Association's 2008 meeting included the following “**Top Ten List for Future State Water Planners**”:

- 1) **Start by Developing a Vision.** A product that is cost-effective and that resonates with policy-makers is one in which participants brainstorm what they want the landscape to look like in 20 or 50 years, putting recommendations up front and identifying benchmarks that help get there. By comparison, plans often start with data collection and a gap analysis, which is resource intensive and controversial.
- 2) **Develop a Political Plan.** This is the piece that will make a technically good plan into a politically acceptable plan. It includes the development of an overall game plan and identifies up front which issues may be deal makers versus deal killers.
- 3) **Build a Solid Foundation on Water Law.** Planners must convey how they plan to allocate any “new” water (i.e., have water laws in place and well understood). Certainty helps build and maintain support during the planning process.
- 4) **Establish Funding Sources.** Planning is not a one-time effort. On-going funding is a key ingredient to ensure buy-in, participation, quality, and implementation of each plan. Find a dedicated funding source, but also leverage additional funding. Integrated planning that includes quality and quantity, water and land, etc., helps leverage additional funds from the federal government, foundations, etc.
- 5) **Employ an Open, Transparent Process.** Give stakeholders plenty of opportunities to suggest goals, methodologies, data sources, and content. Post documents on-line so they are easy to access. Establish Advisory, Stakeholder, and/or Technical Groups that will ensure a wide range of perspectives and expertise.
- 6) **Turn Challenges into Opportunities.** Challenges such as droughts, floods, climate change conditions, population growth, or other water-related events provide opportunities to establish or strengthen a water plan. Water challenges can provide needed insights and political support to improve plans and their implementation.
- 7) **Collaborate across Political Boundaries.** Planning is an inherently political process and must account for the fact that multiple counties, states, and even countries depend on water from the same river basins, watersheds, and aquifers.
- 8) **Use Regional Partnerships to Create Local Solutions.** In states with limited financial resources, supporting a series of disconnected local projects is no longer practical. Foster region-wide or basin-wide partnerships that will account not just for water quantity, but also water quality, ecological needs, land-use planning, and other factors.
- 9) **Standardize Data Sets and Methodologies.** Robust, state-wide forecasting tools, water budgets, and program evaluations require access to data sets that are developed with standardized methodologies. Use incentives to encourage the adoption and sharing of these methodologies.
- 10) **Strive for Consistency (and Flexibility)!** Provide a sense of continuity by building upon the work begun in previous plans and studies. At the same time, those with a background in planning recognize that times change, leaders change, and so does climate. Address important issues of the day to keep your plan relevant. As much as anything, this process is about managing “change,” not just managing “water.”

State governments are in different evolutionary stages when it comes to formal state-wide water planning. While some have not yet begun, other states are in their fourth or fifth decade of planning. The impetus behind water supply planning is likewise varied, with states responding to growing pressures, including: legislative mandates, Endangered Species Act listings, drought, climate change conditions, and projected population growth. Our changing times are reflected in the process of creating these plans, with ever-increasing emphasis on public participation and integrated water management concepts.

## **VII) FUTURE DIRECTION AND RECOMMENDATIONS:**

The following are critical recommendations to make the current process more effective and to reflect the realities faced today:

- Exclusive Service Area (ESA) providers need to be assigned for the three areas of the state that still have not convened WUCC management areas: Northeast, Southwest and Northwest Hills. This action will at least allow for the orderly expansion of public water service and ensure responsible ownership and operation of public water systems in these areas. The next WUCC that is to be convened is the Northeast management area.
- The existing timeline for implementing this planning process in the seven existing management areas, and periodically revisiting each management area, is not practical or reasonable. The process currently involves a two-year commitment in each area. Combined with limited staffing and funding resources, the first round of planning has already taken more than twenty years and has not been completed. Consolidation of management areas needs to be considered in order to accelerate the process and ensure that planning is done in all areas within reasonable intervals. The procedure to revise the management area boundaries and establish priorities for convening each WUCC should be revised to allow the department flexibility to manage the process efficiently. The changes in the water industry and population trends in Connecticut over the past twenty years support the concept of consolidating the existing seven management areas into three or four areas based upon similar water supply needs. The DPH Commissioner's Advisory Committee will make recommendations on realigning current WUCC boundaries to more effectively serve the realities of today.
- Municipalities in each management area must be included as eligible WUCC members. This issue was raised in several management areas by municipalities that wanted a more official role in the planning process. This would also add a critical link to municipal land use planning that may not be adequately addressed under the current WUCC structure. It is recommended that both the chief elected official (or designee) and the local health director be added to the WUCC membership rolls with full voting privileges.
- A need also exists to connect the Certificate of Public Convenience and Necessity (CPCN) process to the WUCC process to ensure the coordinated development of public water systems (PWS) across the state. The CPCN process governs the creation of new PWS in Connecticut. It is essential to coordinate the regulations for the CPCN and WUCC processes to ensure new public water systems being created have proper ownership/management to ensure viability for the long term. Public Act 07-244 recently connected the CPCN process with Exclusive Service Area (ESA) providers. This change will not be fully effective since Exclusive Service Areas are not fully established statewide. It is essential, at a minimum, to convene the final three WUCC management areas and assign Exclusive Service Areas to ensure proper ownership and management of public water systems in Connecticut.
- Definition of technical terms; content of the plan; procedural requirements for the WUCC structure, voting procedures, operating rules, time schedule for developing the plan; and the criteria and procedures for approval of the plan must all be reviewed and incorporated into revised regulations to make the process more efficient and consistent state-wide. The DPH Planning Unit is currently forming a technical advisory group of leaders and experts in the drinking water field. This technical advisory group will work on definitions of terms and ensure consistent water supply plan preparation.
- The criteria and process for establishing exclusive service areas must be revisited and revised as necessary. Regulations/guidance documents are needed to provide assistance to the WUCC management areas for revising an ESA, especially during the periods between plan updates.
- The major criteria for establishing an exclusive service area provider must be to ensure their plan provides for orderly development of pure and adequate water supplies as necessary. Existing WUCC management areas have tended to focus on assigning exclusive service areas to individual utilities. Some exclusive service areas, furthermore, appear to be treated as "franchise areas," where a utility is *entitled* to serve, rather than as areas in which they are *required* to serve."

## **APPENDIX 1-GENERAL BACKGROUND**

### **INTRODUCTION:**

This document discusses the Connecticut Plan water supply planning process and necessary changes to its current operating procedures. A brief background regarding the evolution of water supply planning in Connecticut is also provided for historical perspective.

The following terms are frequently referred to when discussing the Connecticut Plan process:

- **Public Water Supply Management Area**-A geographic area for coordinated water supply planning determined by the Commissioner of Public Health to have similar water supply problems and characteristics.
- **Water Utility Coordinating Committee (WUCC)**-This currently refers to a regional committee consisting of one representative from each public water system with a source of supply or service area within a public water supply management area and one representative from each regional planning organization within the public water supply management area.
- **Exclusive Service Area (ESA)**-An area where the right to provide public water service has been awarded to one system.

### **EVOLUTION OF WATER SUPPLY PLANNING IN CONNECTICUT:**

The state's need for water resources planning was recognized as early as the 1920's. Interest in water resources planning peaks during droughts and declines soon after because it is a challenging process and, without backing from state leaders, the effort is too readily abandoned as other needs arise. In 1950, the State Water Commission publicly claimed "*Solutions to the problems of water resources management do not come neatly packaged, ready-made and conveniently labeled ... Conservation of water requires a delicate balance of uses, allocation of water resources, detailed knowledge of the availability and location of water and a very considerable amount of foresight, planning, judgment and finally – arbitrary decisions.*" Nearly sixty years later, the state still needs to make some of those arbitrary decisions to definitively determine the availability of water and balance competing needs.

In 1964-65 the state experienced a very dry period which represents the standard by which our water resources are evaluated to determine how much water would be available during a drought. As a result of the 60's drought, the legislature passed a bill in 1967 requiring that the state agencies prepare a statewide long-range plan for the management of the water resources of the state. The purpose of this plan was to develop and maintain a strategy for the management of our water resources for public water supply, wastewater, flood management, water-based recreation, aquatic habitat, agriculture, industry, hydropower and navigation.

The dry 60's were followed by the relatively wet 70's, and an economic climate that resulted in a slow down in development and in tight budgets. The federal Safe Drinking Water Act became federal law and drinking water quality became the state's primary water resource focus. Water resource planning was put on the back burner. The drought of 1980-81 refocused the state's attention on the need to plan for drinking water. The most infamous example of problems resulting from a lack of resource planning at that time was the drop in reservoir levels for the system serving the Greenwich area, which resulted in a mere 16 days of water remaining in those reservoirs. Fortunately, the rain returned and a crisis was avoided. As a result of this drought, the legislature created a task force to look at drinking water issues. The task force recommended legislation which was approved by the General Assembly in 1984 and 1985.

Public Act 85-535, "An Act Concerning a Connecticut Plan for Public Water Supply Coordination" was passed by the Connecticut General Assembly in the 1985 legislative session. The Legislature found that

“in order to maximize efficient and effective development of the state’s public water supply systems and to promote public health, safety and welfare, the Department of Public Health (DPH) shall administer a procedure to coordinate the planning of public water supply systems.” The act provides for a coordinated approach to long-range public water supply planning by addressing water quality and quantity issues from an area-wide perspective. The process is designed to bring together public water system representatives and regional planning organizations to discuss long-range public water supply issues and to develop a plan for dealing with those issues. The types of problems public water systems were facing included:

- competition between public water systems for expansion of service areas
- increasing regulatory requirements
- aging and substandard infrastructure
- inadequate source protection
- difficulty in developing new water sources
- inadequate financing
- poor management
- uncoordinated planning among public water systems
- poor or no communication among public water systems
- poor or no communication between public water systems and town officials in communities where water is served

Many of these problems lend themselves to area wide analysis and solutions. In 1986, the state was divided into seven management areas based upon a number of factors, including similarity of water supply problems, such as proliferation of small water systems, groundwater contamination problems, and over allocated water resources. After public hearings were held, area priorities were established to aid in starting the planning process. The planning process was designed to bring water utility representatives and local officials together to discuss current water supply problems and/or deficits, long-range water supply issues, and to develop individual water supply plans based upon this information from each utility required to prepare such plans pursuant to CGS 25-32d. A coordinated water supply plan for addressing all known issues and future needs in each management area was to be built upon the individual water supply plans from each utility and modified by regional requirements. The modifications, or the “area wide supplement”, must include an assessment of water supply problems and conditions within the management area, exclusive service area designations, and integration of individual water utility plans into a cohesive area wide plan, which emphasizes cooperation and coordination between public water systems.

Fueled by monies allocated by the General Assembly in 1985, the Department of Public Health convened the first three WUCC management areas in 1986 and 1987. Plans for these areas were completed, but based on input from the consultants hired to facilitate the writing of these plans, it became evident that legislative constraints on hiring consultants to complete this process in the remaining four management areas were going to make it very difficult, if not impossible, to continue the planning process. Coupled with resource constraints in the first half on the 90’s and problems with the approval of individual water supply plans, required of the largest water systems in each management area, the WUCC planning process was halted until 1998. In 1998, after several failed attempts, Connecticut General Statute 25-33j was revised to eliminate the immediate problem with funding the process which raised the cap from \$100,000 to \$200,000. Sufficient resources were then made available to fund the next plan and the fourth WUCC was convened in Southeastern Connecticut in August 1998. A final plan for this WUCC was approved by the Department of Public Health in February 2002.

Three WUCC management areas still need to be convened in the Northeast, Southwest and Northwest. The next WUCC to be convened will be in the Northeastern management area. Each WUCC must also be reconvened periodically to revise the plan to reflect the changing status of the individual water supply

plans and current planning at the time. This process results in a living document that requires constant vigilance and regular updates to reflect changing economic times and the changing status of individual water supply systems. The provision of adequate potable water resources for industry and commerce is of great importance for the continued economic growth of Connecticut. It is important to complete the area wide plans for the three remaining water supply management areas of the state and to revise all plans periodically. Public water supply needs and issues throughout the state can be defined and addressed through this coordinated water system planning process.

Revisions to the WUCC management area boundaries and operating procedures are necessary in order to streamline the planning process and make it more efficient and effective. The existing timeline for implementing this planning process in the seven existing management areas, and periodically revisiting each management area, is not practical or reasonable. The process currently involves a minimum two-year commitment in each area and takes more than ten years to complete each round of planning. Consolidation of management areas needs to be considered in order to accelerate the process and ensure that planning is done within reasonable intervals. Revising the current WUCC management area boundaries and the operating procedures for establishing priorities for convening each WUCC will allow the department adequate flexibility to manage the process more efficiently.

The elimination of the legislative contract-spending cap should also be pursued. The \$200,000 WUCC contract ceiling mandated by CGS Sec. 25-33j should be eliminated, allowing contracts to be awarded by the department under standard state contract criteria. This would allow the possibility of increasing the individual contract costs; however, coupled with a reduction in the number of WUCC management areas from 7 to 3 or 4, the necessary 10-year plan revisions could potentially be completed for a total reduced cost, irrespective of an increased per contract cost. This would also increase the geographical scope of the management areas to foster expanded regional water supply planning.

Definition of terms; the content of the plan; procedural requirements for the structure of the WUCC, voting procedures, operating rules, the time schedule for developing the plan; and the criteria and procedures for approval of the plan, should also all be reviewed and incorporated into revised WUCC operating rules and procedures in order to make the process more efficient and consistent statewide. The criteria and process for establishing exclusive service areas should be revised and consistent operating guidelines are needed to provide WUCC management areas assistance in revising an ESA, especially during the periods between plan updates.

### **BENEFITS OF THE CT PLAN:**

Watersheds and water supply aquifers often cross political boundaries and management efforts must be coordinated among municipalities. The coordinated water system planning process is a mechanism to define and address area wide or inter-municipal water supply problems and is structured to overcome political boundaries by encouraging interconnections between water utility systems to promote efficient water use and allocation. Also, new sources of water supply will be needed in the future and potential sources are not always located where demand is anticipated. The WUCC planning process in each management area brings together public water systems to discuss water supply issues and needs which will promote better coordination and result in better water supply planning on a regional basis.

The provision of adequate potable water resources for residents, industry, and commerce is also of great importance for the continued economic growth of Connecticut. This fact magnifies then importance of completing the area wide plans for the three remaining Water Supply Management Areas and revising all management area plans periodically. Public water supply needs and issues throughout the state can be defined and addressed through this coordinated water system planning process to ensure Connecticut continues economic growth and maintains the quality of life expected by its residents.



Housatonic:	Upper Connecticut River:	South Central:	Southeast:	Northeast:	Northwest:	Southwest:
convened 6/11/86, completed September 1988	convened 3/24/87, completed March 1989	convened 11/4/87, completed April 1990	convened 8/5/98, completed March 2001, approved by DPH 2/19/2002	(not convened Priority 1)	(not convened Priority 2)	(not convened Priority 3)
Bethel	Avon	Ansonia	Bozrah	Andover	Bethlehem	Bridgeport
Bridgewater	Barkshamsted	Beacon Falls	Colchester	Ashford	Canaan	Darien
Brookfield	Berlin	Bethany	East Haddam	Bolton	Cornwall	Easton
Danbury	Bloomfield	Branford	East Hampton	Brooklyn	Goshen	Fairfield
New Fairfield	Bristol	Cheshire	East Lyme	Canterbury	Kent	Greenwich
New Milford	Burlington	Chester	Franklin	Chaplin	Litchfield	Monroe
Newtown	Canton	Clinton	Griswold	Columbia	Middlebury	New Canaan
Ridgefield	Colebrook	Cromwell	Groton	Coventry	Morris	Norwalk
Roxbury	East Granby	Deep River	Hebron	Eastford	Norfolk North	Redding
Sherman	East Hartford	Derby	Lebanon	Hampton	Canaan	Shelton
Southbury	East Windsor	Durham	Ledyard	Killingly	Plymouth	Stamford
Woodbury	Ellington	East Haddam	Lisbon	Mansfield	Salisbury	Stratford
	Enfield	East Haven	Lyme	Plainfield	Sharon	Trumbull
	Farmington	Essex	Marlborough	Pomfret	Thomaston	Weston
	Glastonbury	Guilford	Montville	Putnam	Torrington	Westport
	Granby	Haddam	New London North	Scotland	Warren	Wilton
	Hartford	Hamden	Stonington	Stafford	Washington	
	Hartland	Killingworth	Norwich	Sterling	Waterbury	
	Harwinton	Madison	Old Lyme	Thompson	Watertown	
	Manchester	Meriden	Preston	Tolland	Winchester	
	New Britain	Middlefield	Salem	Union	Wolcott	
	Newington	Middletown	Sprague	Willington		
	New Hartford	Milford	Stonington	Windham		
	Plainville	Naugatuck	Voluntown	Woodstock		
	Rocky Hill	New Haven North	Waterford			
	Simsbury	Branford				
	Somers	North Haven				

South Windsor	Old Saybrook
Southington	Orange
Suffield	Oxford
Vernon	Portland
West Hartford	Prospect
Wethersfield	Seymour
Windsor	Wallingford
Windsor Locks	Westbrook
	West Haven
	Woodbridge