



STATE OF CONNECTICUT
OFFICE OF POLICY AND MANAGEMENT
Comprehensive Planning and Intergovernmental Policy Division

September 5, 2018

John Betkoski, Chairman
Connecticut Water Planning Council
10 Franklin Square
New Britain, CT 06051

Dear Chairman Betkoski and Members of the Water Planning Council:

By way of this letter, the Interagency Drought Workgroup resubmits for the Water Planning Council's consideration a second draft of the revised *Connecticut Drought Preparedness and Response Plan* (Drought Plan). A first revision of the Drought Plan was previously submitted to the Council from the Water Planning Council Advisory Group (WPCAG) on September 2, 2016. At its regularly scheduled meeting on October 5, 2016, the Council voted to open a 60-day public comment period on the revised Drought Plan, which closed on December 16, 2016. The Council's discussion of the Drought Plan can be found on pages 83-108 of the 10/05/2016 meeting transcription available at www.ct.gov/water.

The Interagency Drought Workgroup created a subcommittee, comprised of representatives from OPM, DPH, DEEP, DESPP, and DoAg, to review the comments received during the public comment period and recommend final edits to the Drought Plan based on such comments. It is the opinion of the Interagency Drought Workgroup that the public comments resulted in a significantly improved draft, which includes the following significant changes:

- Creation of a new subsection (1.3) summarizing the existing authority and resource allocation of the Drought Plan.
- Expanded discussion of drought implications for private well owners.
- Elimination of primary and secondary classifications for drought criteria.
- Explanation of the Northeast Drought Early Warning System.
- Creation of a new subsection (3.2) formalizing procedures for decision-making and application of the Drought Plan.
- Simplification and re-naming of the drought stages and improved explanation for doing so.
- Elimination of pre-assigned agencies for preparedness and mitigation actions in Table 1 and Table 2. For tasks that are not already within an agency's statutory or regulatory purview, this will allow the IDW to assign tasks in accordance with agency resource capabilities and capacity at the time.
- Numerous technical corrections, rewording, renaming of section titles and headings, consolidation of related sections, and other editorial improvements to improve readability.

Despite the above improvements, there are several concerns that are beyond the ability of the Interagency Drought Workgroup to address. To that end, the Interagency Drought Workgroup recommends that the Council consider taking up the following issues:

1. At present, the Drought Plan and the Interagency Drought Workgroup exist in an ad hoc capacity under the collective executive branch authority of the Water Planning Council, its member agencies, and the Governor. Because the Drought Plan is not authorized in statute, its implementation relies upon existing statutory and regularly powers of the agencies that comprise the Interagency Drought Workgroup. There have been external efforts, most recently through [House Bill 5154](#) (2018 session), to legislate a state drought plan. The Council should consider developing legislative recommendations to improve the authority and implementation of the Drought Plan for consideration during a future legislative session, as it offered to do in testimony it submitted regarding HB 5154.
2. As agency resource commitments will be needed in order to accomplish long-term drought preparedness strategies, the WPC may want to consider the most appropriate manner with which to achieve the Drought Plan's preparedness goals given agencies' limited resources.
3. The adoption of water use restriction ordinances by municipalities is considered to be a major element of drought planning and response, but the model water use ordinance featured in Appendix B is deemed inadequate or impractical for some communities. There is also need for better coordination between and among municipalities and public water suppliers on reduction targets. The WPC should consider collaborating with municipalities and public water suppliers to improve and promote the model water use restriction ordinance.

On behalf of the Interagency Drought Workgroup, thank you for your consideration of the revised Drought Plan.

Respectfully,



Eric K. Lindquist
Office of Policy and Management

Cc: Betsey Wingfield, Department of Energy and Environmental Protection
Lori Mathieu, Department of Public Health
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