

November 19, 2018

State Water Planning Council
VIA E-MAIL: wpc@ct.gov

Dear Council Members:

The Norwalk River Watershed Association NRWA is a regional non-profit organization dedicated to protecting the Norwalk River Watershed. Against the backdrop of Connecticut's recent years of drought and the uncertain future of our water supply due to climate change, NRWA is increasingly focused on the protection of our fragile waterways and drinking water supply.

We have learned that the MDC which manages the water supply in the greater Hartford Area is proposing volume discounts for certain super users like water bottling companies. Under the MDC proposal, these super users would also benefit from reduced rates for payments to the Clean Water Project

NRWA submits the following comments with regard to the MDC proposal.

NRWA opposes discounted or reduced rates for large volume users because this practice is inconsistent with the promotion of conservation of Connecticut's irreplaceable natural water resources. In fact, it promotes exactly the opposite. Not only does the state draft water plan mandate practices that promote conservation, but Connecticut General Statutes section 22a-15 also states that there exists a public trust in all natural resources including water. It mandates that the state manage these resources as a trustee of the environment for present and future generations. Reduced rates that are targeted to industries like commercial bottling pollute the environment with plastic, create artificial demand, and detract from the funding of the public water system. Even more egregiously, they commodify and privatize this essential natural resource and also exacerbate this with discounts and reduced rates for the benefit of private corporations and not the common good of the people.

In addition to the financial inequity that would be suffered by residential customers who have subsidized the water infrastructure for years through property taxes and water bills, there is no mechanism for mandatory suspension of commercial water usage during droughts until water shortages reach extreme levels. This means that in times of drought, state residents would have to comply with water restrictions while corporate bottlers continue to pump and profit without restriction until reservoirs are in dire circumstances. This scenario is clearly at odds with the public trust doctrine and must be prevented.

NRWA supports the development and imposition of restrictions on super users in times of water shortages and drought. We also support a pricing structure that encourages conservation. For example, we support the implementation of a low rate for families up to the

amount of water needed for basic daily living. As water usage increases above the basic needs level, the usage rate increases accordingly. Tying pricing to the volume of water used promotes conservation and is a sensible management tool in the protection of our precious and irreplaceable water.

As climate change continues, there are many unknowns as to the future of our water supply. Prudent management requires that we take a conservative approach to preserve and protect water for our residents, our water-dependent industries like oyster farming and other sustainable uses. Proper water management is essential to Connecticut's property values, and to the state's ability to attract employers, families and others who contribute to our prosperity. For all of these reasons, we urge you to address the issue of super users in the state water plan by acting to protect residents rather than corporate profits.

Sincerely,

Lisa Stuart
NRWA Board Member