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norwalkriver.org

February 23, 2020

John S. Mirtle, Esq
District Clerk
The Metropolitan District
555 Main Street
Hartford, CT 06142

Dear Mr. Mirtle, Mr. Jellison and Commissioners,

We appreciate the opportunity to comment on the proposed revisions to District Water Supply and Sewer Ordinances.

The Norwalk River Watershed Association (NRWA) is a regional non-profit organization dedicated to protecting the Norwalk River and its watershed. In the context of the drought conditions we've experienced in Connecticut in recent years and the uncertain future climate change presents for our environment and our water supply, NRWA is increasingly focused on water conservation and the protection of our water supply and vulnerable waterways.

We understand that the Metropolitan District Commission (MDC) is once again planning to offer super users of the water supply large discounts, and specifically that it is offering Niagara Bottling a 20% discount for water and 75% discount for Clean Water Project (CWP) charges that applies when their monthly usage exceeds 600,000 gallons per day.

This represents a major setback to state-wide water conservation efforts. And it means that large corporations will get a hand out even as residential rates climb.

As we have previously stated, the 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. The State Water Plan affirms that water is a sacred public trust resource to be preserved and conserved for present and future generations and requires that the state manage these resources as a responsible trustee of the environment.

Offering volume-based reduced rates targeted to industries like commercial bottling is a practice that is inconsistent with this mandate. Such an approach will pollute the environment with plastic, create

artificial demand, and detract from the funding of the public water system. Water bottling is already a very profitable business and requires no corporate subsidy.

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 promotes 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 to protect our water supply.

With the impacts of climate change escalating, 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.

While we understand the fiscal and social complexities involved as the MDC seeks to set water and sewer rates, NRWA vehemently opposes offering a discount on water and sewer rates to high volume super users as a responsible solution.

Any economic development rate or variable rate structure the MDC devises should not be volume based. Efforts to attract large volume users should be more than matched by efforts to protect existing customers and our irreplaceable natural water supply.

Sincerely,

Cathy Smith
NRWA Board Member