

Contracting Agency: NEIWPCCProject Manager: Kirk Westphal, CDM SmithProject Name: CT State Water Plan, Phase ITask Manager: Elaine Sistare, CDM Smith**Task 1B1 Water Resource Mgmt**

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
GENERAL COMMENTS (overall questions, input on items or topics to potentially be added, etc)						
1	V. de Lima			Overall, I think the white papers are very well done and are very informative. I know I learned a lot!	Agree	ok
2	DeJong			Overall I found them to be very well done. The historically review of water resources and regulations were very informative to me and I suspect will be equally or more so for those less connected to the issues.	Agree	ok
3	V. de Lima			Consistency of terms; e.g., ground water vs groundwater; DEP and DPUC vs DEEP and PURA. Suggest you either choose to use the acronym used at the time of what's being discussed or choose to use the current ones understanding they were not in use before. In either case, the approach should be stated.	Agree	Edited
4	V. de Lima			Will there be a list of abbreviations?	Agree	Yes, as this paper progresses toward becoming a chapter
5	V. de Lima			who is the audience? Some terms will not be understood by even an "interested" public (e.g., Section 319).	Agree	This will need to be discussed; the solution is probably to develop a summary for public consumption.
6	V. de Lima			Consider adding URLs (as in blue box on p. 33)	Needs Discussion	Sometimes these expire or migrate

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7	V. de Lima			Several sections are lifted from existing documents (no problem there) and maintain language, especially pronouns, from those documents that are not appropriate in this context. For example, section 16, top of p. 32, "While our predictions of the impact of climate change..."	Agree	Although this particular example is not from another document, some are, and we will attempt to correct pronouns, etc.
8	Martha Smith		Intro	This paper needs a general intro or overview of the current water management structure. Maybe check the 2003 Beisel report to see how he did it. https://www.cga.ct.gov/2003/pridata/Studies/PDF/Stream_Flow_Final_Report.PDF	Needs Discussion	The Stream Flow report has a good discussion of responsibilities, but they are decidedly geared toward streamflow (for DEEP) and water quantity (for DPH). We prefer the more general text in this paper. However, we added a sentence about OPM and references this report.
9	DEEP			Consistency in "ground water" vs. "groundwater" throughout documents	Agree	Many of the two-word instances are from the PHC or the WQS, and a footnote has been added.
10	DEEP			Not always clear what agency has responsibility for the programs discussed.	Agree	A few clarifications were added.
11	Margaret Miner			Three of the four papers are too heavy on boilerplate-like text that appears to have been copied from agency powerpoint promotions. Too much is presented without. Many of us recommended the Beisel report as a good model. Another good model would be DEEP's Diversion 2000 report, which was readable, factual, and self-critical.	Needs Discussion	It would be helpful for the committees to provide specific examples of which portions of these reports could be incorporated. Some of the reports, like the Beisel report, are too focused on streamflow.

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12	Margaret Miner			Programs that are fairly successful are mixed in with programs that are moribund or fell short of their goals. The agencies should be asked to identify the strengths and weaknesses of their programs, otherwise credibility will suffer. For example, DPH's DWQMP, which was based on a European model, and OPMs new plan of conservation and development (called "growth" something), which was based on an New Jersey (?) model, share the same serious flaw. Both were supposed to be bottom-up plans. In the final step in the models, the participants made binding commitments to the plans. But in CT no commitments were required of the participants. There is a significant chance the state water plan will end in the same somewhat helpful basket, alas.	Needs Discussion	This is a good point, and the agencies could help the planning process evaluate their programs in the coming months. It might be premature to evaluate the programs in this paper.
13	Margaret Miner			The white papers are too long.	Agree	The other three papers are shorter than this one. The 1B1 paper attempts to describe as many water resource management programs as possible, including some that may not take center stage in the State Water Plan.
14	Margaret Miner		Matrices	Too small to read	Agree	Formatting will be addressed

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15	Bob Moore		general comments on 1B1	the paper is a bit to long and hard to stay engaged in reading, needs more graphics and shorter explanations of some of the issues, it seems to miss the focus on the financing of water and wastewater through the CWF and SRF's, and lacks definition on the importance of the Water Quality Standards in protecting the water supply and watersheds.	Agree	Some of these issues will be addressed through revisions. For example, text boxes were added to make this paper more readable (they are not used in the other three papers), and graphics can be added as the relevant portions of the paper are incorporated into the State Water Plan.
16	Bob Moore		Final Comment	I think it is weak on the Water Quality Standards and misses the current funding/financing systems both are critical to implementation of any plan	Needs Discussion	We should reach out to Bob to get specific input about what content can be added.
17	The Nature Conservancy		all	We applaud the holistic view and scope of water, including coastal waters (including the Blue Plan), water quality, dam removals/fish passage, etc provided in these four papers, reflecting the interactions among all of these facets of water in our state.	Agree	OK
18	Larry Bingaman, John Hudak			Suggest the addition of a glossary for the many abbreviations used in this and other white papers.	Agree	This can be worked into this the paper in later editions, or as the relevant parts are incorporated into the State Water Plan.
19	M. Westbrook		General	Does not seem to cover in sufficient details aspects related to agriculture and others besides water companies that divert water - the regulatory programs in this section or in alternatives and challenges in subsequent sections	Needs Discussion	Ag water management programs are relatively disparate in Connecticut. It might be possible to describe programs of the CT Dept of Ag, Uconn Extension, NRCS, and others. We should evaluate whether this will be helpful for the State Water Plan.

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20	M Westbrook		General	Overall lots of good information and good basis for process. Would caution to review thoroughly to ensure that the discussions in this section are limited to a description of the current structure and do not wander into advocating on how they might be better structured - seemed to be a few areas where there were some value laden statements or suggestions.	Agree	Checked for this
WHITE PAPER COMMENTS						
21	Bob Moore		section 1	the order of agency descriptions is different from the text. The DEEP description of authority is deficient in describing its roles in planning and enforcement. Eliminate "the handful of the remaining" ... under PURA . OPM has Budget oversight but not distribution	Needs Discussion	Made some of these edits. Some may need discussion; specifically, what could be added to the DEEP description? We added a few words to help.
22	Ryan Tetreault		1B1-1	Under the Organizations and Regulatory Management Authority for DPH, a sentence should be included that DPH has the statutory authority to develop regulations for private residential wells and semi-public use wells (CGS 19a-37, Public Act 16-66, Section 20).	Agree	Sentence added to the the intro, but the statutory reference was added to the section later in the paper where these programs are addressed.
23	M Westbrook		1B1-1,	Intro should note the four regulator agencies "with separate, and sometimes conflicting, legislative mandates and authorities"	Agree	Added
24	M Westbrook		1B1-1,	Description of DPH should note that they oversee private wells and septic systems; also mention in regulating public water systems 'including the ownership and use of water company owned lands'	Agree	Added

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25	M Westbrook		1B1-1, and 1B1-2	should note that both DEEP and PURA review Water Supply Plans prior to DPH approval; in discussion of PURA delete reference to 'handful of remaining' investor-owned...; change DPUC to PURA	Agree	Added (some of this to the other sections).
26	Lori Mathieu	DPH	page 1 DPH section first sentence	After "Department of Public Health (DPH)... add "under its drinking water section"	Agree	Added
27	Lori Mathieu	DPH	page 1 DPH section first sentence	after "regulating the" add "adequacy and purity per 25-32a	Agree	Added
28	Lori Mathieu	DPH	page 1 DPH section fourth line	after "key" add "state statutory authority in the direct oversight of public water systems"	Agree	Added
29	Lori Mathieu	DPH	page 1 DPH section fifth line	after "plans" add (as well as source water protection	Agree	Added
30	Lori Mathieu	DPH	page 1 DPH section fifth line	after "DPH" add DWS (Drinking Water Section	Agree	Added per above
31	Larry Bingaman, John Hudak		Page 1, 1st paragraph	"Aquifer protection" listed twice	Agree	Deleted first instance. Note this comes from the scope of services.
32	Margaret Miner			Para 1. Under water supply, l. 6 ff, you list "watershed protection." This should be source-water watershed protection. Similarly "aquifer protection" should probably be public-well aquifer protection. In the 4th line from the bottom, you have aquifer protection again? Why. Perhaps you are trying to work in a reference to groundwater.	Agree	Deleted first instance of aquifer protection to make this more concise. Note this comes from the scope of services. The paragraph does not need to imply agency management.
33	Bart Halloran		page 1, paragraph 1	how is wastewater being considered as part of the plan? State does not use class B waters.	Needs Discussion	How the plan will address wastewater is a topic that is still being discussed.

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34	DEEP		Pg 1, Para 1	"aquifer protection" listed 2ce. Should be "Aquifer Protection Area Program" and goes with other DEEP programs	Agree	Deleted first instance of aquifer protection to make this more concise. Note this comes from the scope of services. The paragraph does not need to imply agency management.
35	Margaret Miner		page 1	Para, 1, Under wastewater, l. 9, ff. This is a jumble. Probably should reference POTWs rather than individual "municipal facilities plans" -- why "plans" ? If you say, "plans," you probably should say "plans and operations." Why no reference to private wastewater systems? WPCAs do not seem to fit well here because you are talking about types of facilities not authorities; also, they have least to do with water protection. Possible refer instead to sewer-service planning and funding	Not Applicable	Note this comes from the scope of services.
36	Bart Halloran		page 1	agencies listed - DEEP is part of PURA, this could be conflict of interest with private utilities, and that DPH should reference future water and authority to develop the WUCCs	Disagree	Understood that PURA is part of DEEP, but it is listed separately for consistency with other reports. The other comment appears to be a recommendation for future study.
37	V. de Lima		p.1, sect 1.	mention Conn. has primacy	Agree	Added
38	Margaret Miner		page 1	Para 1. Last 4 lines a jumble, mixing actions (drought management, fisheries management), with resources (recreational waters), with programs. Next to last line, what does "related" signify? Related to what?	Not Applicable	Note this comes from the scope of services.

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39	Margaret Miner		page 1, bullets	<p>1. Without getting too much into history, the traditional responsibilities for water management pre 1970s were divided among drinking water authorities (for a time, we had a water bureau; environmental authorities (primarily fisheries and considerable aquatic habitat, coastal and upland); and agriculture. The executive branch was involved usually only indirectly (through OPM and DPUC). Recommend devoting one or two sentences to referencing this former arrangement, which, as background, will help explain why we have significant problems in water management today, especially with duplication of authorities and gaps in authority.</p>	Needs Discussion	Per discussion in the Policy Committee meeting, a paper with more historical perspective may be possible.
40	Margaret Miner		page 1, bullets	<p>The present four-agency arrangement dates from the 1970s. The Dept. of Agriculture has been an important player (For example, aquaculture -- including upland aquaculture-- was made exempt from the diversion act in about 2002.) Agriculture Dept. should be included in water management.</p>	Needs Discussion	The question is whether the Department of Ag is a major player in water management today. This needs some discussion; see also M. Westbrook's point above.

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41	Margaret Miner		page 1, bullets	Beginning the 1980s, the CT General Assembly assumed increasing executive control over water regulation, having a veto power over agency regulations that is almost unique among the states. (The expansion of CGA authority was primarily related to proposed water regulations.) It was the CGA that created the Water Planning Council. CGA control should be included in overview of water management in CT	Agree	Added at least the reference to the CGA, but did not add historical perspective.
42	Margaret Miner		bullets	The Energy and Technology Committee specifically, created the WPC; the Environment, Committee, Dept. of Agriculture, and the governor's office were less involved. So the WPC was oriented from the start toward dealing with water-supply utilities not natural waters.	Agree	Added the committee reference
43	Margaret Miner		bullets	Add that DPH (not just DEEP) has authority over wastewater, almost exclusively the small, privately owned traditional wastewater systems. [FYI, DPH It has been given statutory authority over small "advanced" (hi-tech, non-traditional) systems, but has declined to write regulations and take on that authority.} Over much of the state, regulation of small wastewater systems is essential to protecting water quality.	Agree	Added a sentence about septic systems

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44	Margaret Miner		bullets	DEEP. You refer to “numerous” programs. Why these examples of numerous programs? Overseeing watershed management plans? These are largely voluntary. DEEP does have regulatory authority over contamination of groundwater. In this respect, DEEP has some authority to protect source-water wells, especially private wells. It has authority over treatment of haz waste prior to discharge to waters. It also has authority over the state’s protection of wetlands; but implementation of this authority has shrunk almost to zero.	Agree	A few edits were made to this paragraph.
45	Margaret Miner		bullets	OPM. Recommend saying that OPM has a responsibility to ensure <i>as far as possible</i> consistency among plans. CT has not achieved consistency among all the layers and diversity of plans. It does invest considerable resources in the effort to achieve consistency.	Disagree	This is somewhat subjective.
46	M Westbrook		1B1-2	would help to list the areas of investigation of the 3 WPC committtees pursuant to PA 01-177; would note that WPC has 'provided an update to the CGA on their work annually' ; would either omit the examples of their progress in promoting policy or expand - not really sure WPC promoted streamflow regs? The Water Conservation legislation, WICA changes were directly related to WPC work	Needs Discussion	Deleted some of this paragraph.

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47	M Westbrook		1B1-2	Would further describe the makeup of the WPCAG and the language of the statute describing the broad stakeholder representation	Needs Discussion	Need some input for WPCAG text.
48	M Westbrook		1B1-2	I would not attribute the Steering Committee as currently constituted to a WPCAG recommendation - if you do I would clarify "While the WPCAG envisioned a small committee to provide timely feedback to the consultant in the process between WPC meetings, the SC ultimately was much more expansive and includes ## members, including all of those on the WPC."	Agree	Added sentence, although this section may benefit from being scaled back as noted above.
49	V. de Lima		p. 2, 1st bullet	Unclear. Implies DPUC still exists and regulates some investor-owned companies that PURA does not. Does it still exist?	Agree	Edited
50	D. Radka		Page 2, 1st bullet	add wastewater to investor-owner utilities	Agree	Edited
51	DeJong		page 2/bullet 1	consider revising: "handful of the remaining investor-owned water utilities"	Agree	Edited
52	Martha Smith		Pg 2, 1st new ¶	The Water Planning Council was initially established for a one-year report project; the report deadline was extended to two years. After the report was completed the Water Planning Council continued meeting to address water resource issues. \	Needs Discussion	Not sure this is needed.
53	Martha Smith		Pg 2, 1st new ¶	Not sure if this is the spot, but it should be mentioned that the WPC does not receive regular/specific/dedicated funds from the state.	Agree	Edited
54	DEEP		Pg 2, Para 2	Delete "handful of remaining"	Agree	Edited

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55	Lori Mathieu	DPH	page 2 PURA section	cross out "and participates in the review and approval of new public water systems(with DPH)	Disagree	Added "formerly" instead because this is very recent.
56	Lori Mathieu	DPH	page 2 PURA section	Change DPUC to PURA	Agree	Edited
57	Larry Bingaman, John Hudak		Page 2, Public Utilities Regulatory Authority	The former name of PURA, DPUC, is used twice in the paragraph instead of the current name	Agree	Edited
58	DEEP		Pg 2, para2	PURA doesn't oversee energy planning in the state, the DEEP Bureau of Energy Technology Policy does.	Agree	Edited
59	Margaret Miner		page 2, para. 4	recommend that you include a citation for the mission of the WPC, which is given in quotes. It is not in the statute.	Agree	Added
60	Lori Mathieu	DPH	page 2 fourth full para regarding streamflow	Not a WPC initiative, a DEEP initiative	Agree	Deleted
61	DEEP		Pg 2, Para 5	DEEP oversaw the Streamflow Standards development, not WPC?	Agree	Deleted

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62	Margaret Miner		page 2, para 5	You skim over the three committees created by the WPC to do the work stipulated in PA 001-177. The nine multi-stakeholder committees produced recommendations on all aspects of water policy referenced in the plan. I'd guess that about 40 people were involved. Consensus was achieved on all (or all but one) issue. Many (probably most) of those people are also stakeholders today, and are involved in the new water planning process. The WPC website is more on target with respect to importance, even if too long for this paper. Recommend either delete reference or provide some hint of the outcome.	Agree	Added
63	Lori Mathieu	DPH	page 2 fith full para	note that PA 07-4 section 2 c was in 2007	Agree	Added
64	Lori Mathieu	DPH	page 2 fith full para	after "WPCAG", note "under the direction of the WPC"	Disagree	The text already makes it clear that the WPC formed and directs the WPCAG.

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65	Margaret Miner		WEBSITE EXCERPT	<p>The WPC initially established three Committees to investigate specific issues identified in PA 01-177 and submitted an Issues Work Plan to the Legislature on January 28, 2002. The three committees were, the Water Resource Management Committee, Water Utility Committee, and the Technical Management Committee. The three Committees, co-chaired by representatives of 3 state agencies, each formed two subcommittees co-chaired by stakeholders performing the research and analysis laid out in the WPC Issues Work Plan. The charge given to the subcommittees was to address the issues in accordance with the WPC Issues Work Plan and submit a report to the WPC offering an analysis and recommendations.</p> <p>The Water Allocation Policy Planning Model developed by the Water Resource Allocation subcommittee in 2002 and the remaining Action Items continue to be the foundation for the WPC's 2011 and future work plans.</p>	Agree	Added some of this
66	Lori Mathieu	DPH	page 2 sixth full para	at end of para, add "to assist the WPC w/development of the SWP and advise	Agree	Edited
67	V. de Lima		p. 2, 2nd to last ¶	In 2015, AFTER PASSAGE OF PA14-164, ... I think the Steering Committee was recommended in the public comments on the MOU with UCONN.	Agree	See edit two rows below; this has been simplified.

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68	Lori Mathieu	DPH	page 2 seventh full para	cross out steering committee as "steering committee is not developing the SWP"	Agree	Edited
69	DEEP		Pg 2, para 7	the WPCAG did not suggest forming the Steering Committee to WPC, this was actually somewhat controversial, as it was originally anticipated the WPCAG would serve in that role.	Agree	Edited
70	DEEP		Pg 2, Para 8	Enumerate subcommittees thus far.	Agree	Edited
71	DeJong		page 2/second to last para	check on WPCAG recommending the formation of a steering committee	Agree	See edit above; this has been simplified.
72	Larry Bingaman, John Hudak		Page 2, last paragraph	Clarify that the Other States' Plans Work Group was a work group of the WPCAG; consider moving explanation to the WPCAG paragraph above	Agree	Edited
73	Larry Bingaman, John Hudak		Pages 2-3	Use correct terminology for subcommittee names, i.e., Policy Subcommittee, Science & Technical Subcommittee	Agree	Edited
74	DEEP		Pg 3	"active subcommittees of the Steering Committee"; and should something brief be said about Policy and Science & Tech Subcommittee's charge or purpose?	Agree	Edited
75	Lori Mathieu	DPH	page 3	after "subcommittees" add "under the direction of WPC"	Agree	See edit above.
76	Bart Halloran		page 3, paragraph 5	re: Streamflow - which is not being implemented	Agree	This has been deleted per edits above
77	Larry Bingaman, John Hudak		Page 4	Provide a narrative explaining the matrix and its purpose	Needs Discussion	Matrix to be handled/possibly moved
78	M Westbrook		1B1-4	Would add water company lands separately in the list	Not Applicable	The list in the matrix was meant to follow the organization of the paper.
79	V. de Lima		p. 4, sect 2	What is the purpose of this matrix? Suggest and introductory paragraph.	Needs Discussion	Matrix to be handled/possibly moved

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80	DEEP		Pg 4, topic matrix	Need some explanation of what the "topic matrix" is - it is not immediately clear what the rows and columns are, and the matrix itself is inserted between the first and second sections, so it's a little out of order.	Needs Discussion	Matrix to be handled/possibly moved
81	Bart Halloran		matrix Table	Topic matrix table why isn't the C&D plan involved with incentivizing (10) reuse of water policies based on "where the water is"? And • Why isn't (14) streamflow being considered for its impacts on regional water use	Not Applicable	The list in the matrix was meant to follow the organization of the paper.
82	V. de Lima		p. 4 matrix	Identify what the column and row headings represent. This is a very interesting analysis!	Needs Discussion	Matrix to be handled/possibly moved
83	DEEP		topic matrix	The first row doesn't really make sense as I'm not clear on how a description of the 4 agencies relates to any of the 17 requirements of the legislation.	Needs Discussion	Matrix to be handled/possibly moved
84	DEEP		topic matrix	Shouldn't all the programs listed have at least a partial linkage to column 17?	Needs Discussion	Matrix to be handled/possibly moved
85	DEEP		topic matrix	Seems the energy strategy should have a "P" for columns 3 and 10	Needs Discussion	Matrix to be handled/possibly moved
86	Bob Moore		2 Topic Matrix	it is hard to understand the matrix choices of programs and the y, n, p selection, needs some debate, WQS and SRF are missing	Needs Discussion	Matrix to be handled/possibly moved
87	DEEP		topic matrix	I'm not sure how much the topic matrix as a whole adds to the document (more of an internal checklist?)	Needs Discussion	Matrix to be handled/possibly moved
88	Martha Smith		Table, pg 4-5	Very Confusing; this needs an explanation and Column and Row Titles, at the very least.	Needs Discussion	Matrix to be handled/possibly moved
89	The Nature Conservancy		between pages 4 and 5	Topic Matrix is hard to read and insufficiently explained.	Needs Discussion	Matrix to be handled/possibly moved

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90	Larry Bingaman, John Hudak		Page 5, first paragraph, first sentence	Change "public water utilities" to "water companies" to be consistent with the statute	Agree	Edited
91	DEEP		Pg 5, para 1	...people are required to <u>develop</u> and maintain a water supply plan....	Agree	Edited
92	M Westbrook		1B1-5 Sec 3.1	Would add that WSPs are provided to DEEP, PURA and OPM for review and comment and concurrence is required before the plan is approved	Agree	Text added
93	Larry Bingaman, John Hudak		Page 5, first paragraph, last sentence	Provide a source or citation for DPH's "principal goals"	Agree	We are looking for the original source
94	Bob Moore		3.1 Individual Water supply	it does not explain that water demand and current supply information is unavailable due to FOI and security issues and much of the planning is protected from the public view	Not Applicable	This is discussed in another paper.
95	Lori Mathieu	DPH	page 5 first para	ammend "25-32d" to "25-32d-1"	Agree	Edited
96	Lori Mathieu	DPH	page 5 first para	update "5-10" years to "6-9 years"	Agree	Edited
97	Lori Mathieu	DPH	page 5 blue box	was an outcome of the 1980's water resources task force	Agree	Text added
98	V. de Lima		p. 5, 3rd ¶	I was thrown by "acclimate." Suggest "adjust."	Agree	Edited
99	Lori Mathieu	DPH	page 5 third para	add at end, "and are planning to meet projected demand over a 50 year period"	Agree	Edited
100	Larry Bingaman, John Hudak		Page 5, 3rd paragraph	What is meant by "area land use"? Watershed and aquifers?	Agree	Edited
101	Bart Halloran		page 5 section. 3.2	last sentence of paragraph should add "And i	Disagree	Let's leave this out; other would not agree

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102	M Westbrook		1B1-5 Sec 3.2	I would say that the planning process was prompted by the drought but aslo 'an effort to address the proliferation of small water systems in CT.' ; would add ...assure adequate future supplies.	Agree	Added the last part
103	M Westbrook		1B1-6 Sec 3.2	Would add in discussion of process for review of WUCC plans by local CEOs and other agencies	Agree	Added to the end
104	Bob Moore		3.3	Community and non-community systems should be defined	Agree	Will do this with the glossary when added
105	Bart Halloran		page 6	Section 3.2 needs to include a description of the major component of the coordinated water plan, including the Water Supply Assessment, Exclusive Service Areas and Integrated Report	Disagree	They are listed rather than described (for brevity). We could add a reference for the reader that directs him or her to the WUCC reports that are under development.
106	The Nature Conservancy		page 6	Last paragraph is unclear. Is it saying that a CPCN is not necessary and that only WUCC review in a PWSMA is necessary if a new water system is being created in an area where there's no other water system that could provide the service?	Agree	Clarified
107	Larry Bingaman, John Hudak		Page 6, sentence starting with "A Coordinated Water System Plan"..."	Would be worthwhile to expand on this paragraph to describe the various components of WUCC Plans, including the significance and purpose of ESAs	Disagree	They are listed rather than described (for brevity). We could add a reference for the reader that directs him or her to the WUCC reports that are under development.
108	M Westbrook		1B1-6 Sec 3.3	I am not sure other states necessarily have a process similar to CT's CPCN?	Agree	Other states have staged review processes, so we added some clarification.
109	DEEP		Pg 6 para 1	Since so few potential WUCC members participate, maybe instead of "consists of one representative", should say "WUCC membership is open to one representative..."	Agree	Added the text, although non-participating members are still members of the WUCC.

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110	DEEP		Pg 6 para 2	5th bullet should be eliminated and the text pulled out to the paragraph level, as these are not part of the list that convened	Agree	Edited
111	D. Radka		Page 6, 3rd paragraph	Due to the lack of individual water supply plans being approved at the time, the Southeastern WUCC plan was the only plan "formally" approved by DPH. The 3 earlier plans were accepted by members as approved documents, and acted upon, accordingly.	Agree	Edited
112	V. de Lima		p. 6, 3rd ¶ (after bullets)	"... an area wide supplement" is not clear	Agree	Added quotes to show it is a term
113	DEEP		Pg 6, para 4	Should mention the change to WUCC statutes that requires the Coordinated Plan to consider impacts on other uses of water resources	Disagree	There is already a lot of information about the WUCCs; we could add a reference to the ongoing WUCC process.
114	DEEP		Pg 6, para 5	...the CPCN is believed similar	Agree	Edited
115	DEEP		Pg 6, para 6	Delete "or" in 2nd line	Disagree	This appears to be needed
116	Bob Moore		4.1 and 4,2	should indicate that no coordinated data on private well quantity and quality exists and no regular testing of wells required	Agree	See Ryan's edits below.
117	Larry Bingaman, John Hudak		Pages 7-9	Section on the SDWA, while informative, is probably more detailed than it needs to be for the purpose of the document. Consider reducing in favor of devoting more space to Connecticut specific topics, e.g., WUCCs, Water Company Lands. It should be noted that DPH has delegated authority from EPA, which is not true for some states.	Agree	This will be migrated out to an appendix or other location when this paper is merged into the State Water Plan.

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
118	M Westbrook		1B1-7 Sec 3.3	Would explain at the end of this section that "there were legislative changes to the CPCN process adopted in the 2016 session and that work continues on small systems through a workgroup of the WPCAG and a pending docket before PURA (##)." Could also mention the Townsely Report done at request of WPC pursuant to legislation	Needs Discussion	This might be better for a subsection about small water systems, rather than in the CPCN subsection.
119	Lori Mathieu	DPH	page 7	cross out first 2 lines "due to PA16?"	Disagree	This is in here because it's recent
120	Lori Mathieu	DPH	page 7 third line	add "for all new PWS"	Agree	Edited
121	The Nature Conservancy		page 7	Do the 73 local health departments and districts cover private wells in all of CT's towns or are some towns without a health district?	Agree	Clarified
122	The Nature Conservancy		1B1 - page 7	It would be helpful to briefly define "Community systems" (and "non-community systems") which are mentioned for the first time on page 7.	Agree	We will get these in a glossary
123	D. Radka		Page 7, first para	Revise discussion of DPH/PURA coordination of CPCN projects to reflect statutory changes.	Agree	The previous arrangement remains in the text because it's recent.
124	DEEP		Pg 7, para 2/3	Should we mention that well drilling is regulated by DCP and well completion reports are required? Because there is a specific need to make the well completion reports electronic that we should be identifying at some point in the Plan.	Agree	Added that DCP has the reports
125	DeJong		page 7	Should there be mention of non-community/transient/non-transient systems?	Needs Discussion	In which context?
126	Lori Mathieu	DPH	page 7 4.2	overseen by private well program?	Needs Discussion	Is this a correction or question?

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
127	Ryan Tetreault		1B1-7	Under 4.1 Private Well Program, second paragraph, 2nd sentence should read "Private wells must be properly sited, tested, and the water quality results approved by the local director of health before a certificate of occupancy is granted." 3rd sentence should read "DPH maintains a Private Well Program that provides outreach and education to the public, technical guidance, and training to local health departments and districts." It is also important to include a sentence on water quality in private wells - "Private wells are initially tested when a well is first constructed for basic parameters and may not be tested for several years thereafter. Private wells are typically tested during the home inspection of a real estate transaction or when required by a mortgage company. Testing of private wells since 2013 for metals such as arsenic and uranium that were not likely included in the basic testing of a private well prior to this timeframe has resulted in the identification of areas of the state with very high levels of these naturally occurring contaminants."	Agree	Text edited and added
128	V. de Lima		p. 7, sect. 5, 2nd ¶	promulgated by whom?	Agree	This will be migrated out to an appendix or other location when this paper is merged into the State Water Plan.

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
129	V. de Lima		p. 7, sect. 5, 3rd ¶ through p. 8 up to last ¶ AND p. 9 first full ¶ through end of sect.	not sure this detail adds anything. Last ¶ p. 8 and top of p. 9 is meaningful.	Agree	This will be migrated out to an appendix or other location when this paper is merged into the State Water Plan.
130	Bob Moore		5, Safe Drinking water Act	Gets too detailed at the end and can be shortened	Agree	This will be migrated out to an appendix or other location when this paper is merged into the State Water Plan.
131	D. Radka		Page 8	Less detail would suffice.	Agree	This will be migrated out to an appendix or other location when this paper is merged into the State Water Plan.
132	Glenn Warner		Page 1B1-8	Regarding lead and copper action levels-suggest giving values similar to some other contaminants	Disagree	This is going to be removed or shortened
133	Lori Mathieu	DPH	page 8 last para first line	after "regulation of" add "public"	Agree	Edited
134	Lori Mathieu	DPH	page 8 last para second line	after "PHC" add "by the DPH"	Agree	Edited
135	DEEP		Pgs 8 - 9	Is such a detailed history of SDWA needed? Could be simplified and shortened.	Agree	This will be migrated out to an appendix or other location when this paper is merged into the State Water Plan.

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
136	M Westbrook		1b1-9	Discussion of Source Water Protection should include a specific subsection regarding water company lands statutes; Whether within this or a separate section would suggest some discussion of the limitations of Class B waters from a public health perspective and how that has been benefit as other states dealt with pharmaceuticals in drinking water and other water quality issues	Agree	Added water company lands statute. Class B limitations are addressed in the other papers.
137	Lori Mathieu	DPH	page 9	DPH can provide a detailed outline of SDWA rules from an Appendix	Agree	This will be migrated out to an appendix or other location when this paper is merged into the State Water Plan.
138	Lori Mathieu	DPH	page 9 6.1 4th line	after SWAP add "as administered by the DPH"	Agree	Edited
139	Lori Mathieu	DPH	page 9 6.1	ADD PA 85-279 from WRTF Report	Needs Discussion	Need to obtain this information
140	Bob Moore		6.1 Source water protection	does not describe the differing roles of the DEEP and DPH fully and ground water quality standards and siting protections offered	Disagree	This particular section is focused on the existing programs from the PHC and/or administered by DPH for drinking water source protection.
141	D. Radka		Page 10	Bullets provide unnecessary detail.	Agree	This will be migrated out to an appendix or other location when this paper is merged into the State Water Plan.
142	Bart Halloran		page 10	Must clarify this with the DEEPs responsibilities for sect 8, water quality and watershed management. Very important and distinct differences in DPH vs. DEEP goals. See section 8 for additional comments	Other	OK
143	Lori Mathieu	DPH	page 10 bullets	change Citizen's advisory Committee to "stake holder committee"	Agree	Edited

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
144	Lori Mathieu	DPH	page 10 first para after bullets second line	after "Connecticut" add "and due to reg change to 25-32d-1 have been incorporated under water supply planning"	Agree	Edited
145	DEEP		Pg 10, bullet 1	Delete "smaller" in 4th line - all the bedrock wells were treated this way	Agree	Edited
146	Larry Bingaman, John Hudak		Page 10, last paragraph of Sec 6.1	Suggested language change to first sentence: "The SWAP's intended purpose was as a"	Agree	Edited
147	M Westbrook		1b1-10 Sec 6.2	Would mention in this section DPH's ability to comment on local land use applications in public water supply watershed or aquifer areas.	Agree	Added text and cross-referenced to the 1B2 paper.
148	Bob Moore		6.2 public water supply watershed protection	does not describe the Water quality standards protections and discharge prohibitions or roles of agencies	Agree	Added to the WQS section
149	M Westbrook		1b1-11 Sec 6.2	This list seems far too detailed for the purposes of this report; a reference to the section and mention of the types of things governed by the health code provisions (sewage, animal wastes, fertilizer, etc) would be more appropriate	Agree	This will be migrated out to an appendix or other location when this paper is merged into the State Water Plan.
150	Larry Bingaman, John Hudak		Page 12-13, table of regulations and statutes	Water Company Lands and Prohibition of Sewage Discharges are both pillars of water supply protection in CT worthy of detailed discussion\ Narratives for both should be added to the document. Also noted that the Water Company Lands laws are listed twice in the table.	Agree	Deleted the redundant row in the table and added the prohibition to the WQS section.
151	M Westbrook		1b1-12 to 13	Table is good summary	Agree	OK

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Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
152	V. de Lima		p. 10-13, sect. 6.2	similar to #12: why is this level of detail included and other similar sections are referred to by reference? Consider excerpting a few important points. "Sanitation" is not a term I'm familiar with.	Agree	This will be migrated out to an appendix or other location when this paper is merged into the State Water Plan.
153	DEEP		Pg 14, box	the word "public" is misplaced - should be last word in the box.	Agree	Edited
154	M Westbrook		1b1-14	Text box cut out some of the text	Agree	Edited
155	Larry Bingaman, John Hudak		Page 14, textbox	Unfinished sentence at end	Agree	Edited
156	V. de Lima		p. 14, sect. 6.3, 2nd ¶, second to last sentence	I don't understand "Numerous elements of a DWQMP are possible."	Agree	Deleted
157	Lori Mathieu	DPH	page 14 third para	somewhat incorporated w/m water supply plans per reg change in 2006.	Needs Discussion	Timing doesn't make sense; what was incorporated?
158	V. de Lima		p. 14, sect. 6.4	Is there any more info on this?	Needs Discussion	Will look into this
159	Larry Bingaman, John Hudak		Page 14, Section 6.4	Add NGOs to list of Source Water Collaborative members	Agree	Added

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
160	DEEP		Pg 14, Sec 6.5, para 1	Section on APA Program needs editing. Suggested language 1st para: "The Aquifer Protection Area (APA) Program is Connecticut's wellhead protection program. Enacted in 1990, the APA Program applies to public water supply wells in stratified drift that serve more than 1000 people (the state's most productive wells). The water company owning the well(s) maps the portion of the aquifer that contributes ground water to the well in accordance with DEEP regulations. The mapping is approved by DEEP, and provided to the municipality. The municipality then adopts the mapping and imposes land use restrictions within the mapped area in a pro-active effort to protect the well(s) from contamination.	Agree	Added text.
161	D. Radka		Page 14, 6.5	APA program maps "contributing areas to public water supply wells completed in stratified deposits" not aquifers.	Agree	DEEP text used
162	V. de Lima		p. 14, sect. 6.5	act was enacted in 1990, but not implemented until after 2000 (someone at DEEP could give you the actual date)	Agree	DEEP text used

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
163	DEEP		Sec 6.5 continuation	Not sure we need so much detail on what Level B vs. Level A is, most of the mapping is completed to Level A. Suggested language: "The mapping is conducted in two phases: Level B is preliminary and provides a rough estimate of the contributing area to the well field. Level B mapping was completed in the early 1990s and provided to the towns for planning purposes. Level A mapping, or final mapping, is a refinement of Level B ..." (and then pick up with the discussion of what Level A is)	Agree	DEEP text used
164	DEEP		Pg 15, para 3	This description is not quite right. Suggested language: "The APA program defines 28 regulated activities that use, handle or store hazardous materials. New businesses conducted these regulated activities are prohibited from locating in APAs. Existing regulated activities in APAs must register and certify to best management practices. A permitting process also allows changes to registered regulated activities in APAs."	Agree	DEEP text incorporated
165	Lori Mathieu	DPH	page 15 third para third line	after "through a" add "local"	Not Applicable	DEEP text incorporated
166	D. Radka		Page 15, 6.5	Also note APA program requires municipalities to notify water companies of proposed development in APA/watersheds.	Agree	Added

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
167	Larry Bingaman, John Hudak		Page 15, last paragraph of Sec 6.5	Clarification needed of rules governing regulated facilities in Aquifer Protection Areas. In general, new proposed regulated activities are prohibited. Permits generally apply when adding or changing a regulated activity associated with a site containing an existing regulated activity.	Agree	DEEP text incorporated
168	Lori Mathieu	DPH	page 15 last para 2nd line	this is a draft revision [of the drought plan] which remains under review. Should outline existing plan	Agree	Added "draft" in a few places; this will likely be changing at the same time as the State Water Plan development anyway (see last sentence of the section).
169	Bart Halloran		page 15, paragraph 6	re: 2003 drought plan - Is this document cons	Needs Discussion	Will review this
170	Larry Bingaman, John Hudak		Page 15, last paragraph	Mention that the State Drought Plan was updated by a WPCAG Drought Workgroup in 2016. However the Plan as yet to be formally adopted. We also suggest adding the following recommendation from the Plan with respect to model drought ordinances: "There is a need to develop multiple model ordinances to address differing water systems and differing water needs in each community".	Agree	Added "draft" in a few places; this will likely be changing at the same time as the State Water Plan development anyway (see last sentence of the section). Suggested text was also added.

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
171	Bart Halloran		page 15, section	re: interagency drought workgroup - what authority does this agency have? It references independent standing committee and states that it was reestablished.was this done by any formal action of the state agencies? It states "future revisions to plan may be needed" - the drought plan is in draft form only and has not been finalized. Also last sentence in section impossible, WPCAG proposed plan already conflicts with MDC plan, not considering reservoir capacity at all)	Needs Discussion	Added "draft" in a few places; this will likely be changing at the same time as the State Water Plan development anyway.
172	Bob Moore		7. Drought Management	lack of enforceable requirements not identified	Agree	Added
173	V. de Lima		p. 15, sect 7, last ¶	Actually, the redo started in 2010! (I just found the agenda of the first meeting; I'll change it in the Drought Plan)	Agree	Edited
174	Bart Halloran		page 16 after obj	objective # 2 % capacity and starting trigger points conflict with MDC objective and # 7 Future revisions should be accomplished through DPH oversight.	Disagree	The paper shouldn't get into detail about conflicts with one utility, but the review of the Drought Plan and its use in the State Water Plan can and should take this up.
175	DEEP		Pg 16, last para, 1st line	Add "Regulations of Connecticut State Agencies" to citation	Agree	Added
176	DEEP		Pg 16, last para	Add that DEEP administers these regulations	Agree	Added (a little bit lower)
177	Glenn Warner		Page 1B1-16	under Drought plan objectives-clarify under point 1 that a section in Plan addresses long term planning for water conservation and drought preparation, not just prior (short term) to a drought declaration	Agree	Added

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
178	Bob Moore		8.1 Water Quality standards	Class AA and A, discussion missing on role to protect water supply and the interstate protection offered through CWA. does not mention ground water quality standards unique to CT. The historic and current protection of supplies needs to be explained. Later the emphasis on Class B implies that the AA protection of surface water an impediment to future supply, the entire pollution control program is based on the WQS. I see this as a critical issue and it is not given appropriate review.	Needs Discussion	Added some text. Perhaps additional text could be suggested.
179	DEEP		Pg 17, sec 8.1	Note that there are Surface Water Standards and Ground Water Standards. The Surface Water Standards are adopted in accordance with the federal Clean Water Act. The Ground Water Standards, while not required under the federal program, are parallel, and provide important protection for drinking water sources. Should discuss the protections afforded by the Water Quality Standards for both surface and ground water drinking water supplies.	Agree	Added text
180	Larry Bingaman, John Hudak		Page 17, last paragraph of Sec 8.1	Good place to discuss CT's designations for Class A and B waters and Sec 22a-417 CGS with respect to water supply sources and wastewater discharges.	Agree	A paragraph from the 1B3 paper was copied here
181	Bart Halloran		page 17 sec. 8.2	MDC would contest East Branch and Nepaug rivers are not impaired streams. They are not streams at all by design, the streams were eliminated for purposes of impounding drinking water.	Not Applicable	To be addressed outside this paper.
182	DEEP		Pg 18, bullet 6	State River Restoration Grants is no longer funded, delete reference to these	Agree	Deleted

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
183	Bart Halloran		page 18 paragraph 1	Need to clarify DPH's role to protect Drinking Water Watershed vs DEEP's responsibility under this section. DEEP does not protect watershed supporting drinking water reservoirs, since this reservoir watershed impounds the water and the water never reaches the streams within the larger watershed which DEEP is responsible to protect.	Agree	Agree with the first part and added clarification up front, although we state this toward the end of the section; uncertain about the point the second part of this comment is making
184	M Westbrook		1B1-18	Not sure a full description of all of EPAs 9 elements are necessary here; also	Agree	To be moved out when this paper goes to the next level
185	Martha Smith		pg 19, Final ¶ of Sect 8.3	Comment on DPH and DEEP watershed management. My impression is that their watershed management overlaps. Also, mentioning "critical" to maintain different watershed management programs verges into "opinion" territory.	Agree	Deleted "critical" and re-worded this
186	Bart Halloran		page 19	DPH should be involved in watershed of public water supply as deep watershed management program does not address it	Agree	This is now stated in two places

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
187	The Nature Conservancy		page 19	Although this section subsequently lists exemptions, they are a critical enough feature of the legislation that they should be mentioned in the initial description of the statute, in the following sentence on page 19: "A significant piece of legislation regarding water quantity occurred with the passage of the Water Diversion Policy Act of 1982 (Sections 22a-365 through 22a-379 of the Connecticut General Statutes). This act established a permitting process for any NEW, NON-EXEMPTED consumptive or non-consumptive "diversion" from (or of) a water source, and is essentially the State's version of regulated riparian water law."	Agree	Added
188	DEEP		Pg 19, last para of Sec 8.3	Delete last sentence. Add ", as these are managed under the source protection programs described earlier. The watershed management and source protection programs are both integral and complimentary to one another."	Agree	A prior edit took care of this, but we added some of this.
189	DeJong		page 19/middle para	discussion of WMP and "watershed mgmt programs" not clear	Agree	This paragraph has been edited per other comments
190	DEEP		Pg 19, 1st para of 9.1, 4th line	change "source" to "body, both surface water and ground water"	agree	Edited
191	V. de Lima		p. 19, sect 9.1, last ¶	Description of "consumptive" would be clearer if sentence was flipped, "In addition to applying to withdrawals, consumptive used include...discharge."	Needs Discussion	Need to go back to this one; it doesn't appear to work
192	DEEP		Pg 19, 2nd box	PA 02-103 was amnesty for diverters that were eligible to register, but failed to do so, not amnesty for permits.	Agree	Text added

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
193	M Westbrook		1B1-19	in last paragraph in this section would replace "This is the reason that....." with "As such, "; also would omit the text box or at least delete first sentence in it	Agree	Prior edits took care of this, but the text box was left in place because it provides a couple examples for those who are not aware of any.
194	DEEP		Pg 20, sec 9.1	Add considerations (in general) for obtaining a diversion permit - what it entails	Agree	Text added
195	V. de Lima		p. 20, sect 9.1, last line	"... nearby stream STAGE records." Really? Not flow? (USGS runs many gages for permit holders so they can get flow info)	Not Applicable	Yes, stage is correct
196	Glenn Warner		Page 1B1-20	under registrations. Addressing any regulations or policies (or lack thereof) regarding the sale, transfer or modification of intended water use for registrations. What truly keeps the registrations from being "water rights" ?	Needs Discussion	Not sure this is needed.
197	M Westbrook		1B1-20 Sec 9.2	Think there needs to be explanation around the number of 1842 registrations that some of those may no longer exist (strawberry farm that is now condo served by public water) but no mechanism to remove from DEEP's list; also need broader discussion of the types of registrations - specifically the agricultural and industrial users as well as any unique exemptions provided for ag	Agree	Added some clarifications
198	D. Radka		Page 20, 9.2, 1st sentence	Registered diversion are exempt from the "permitting requirements of the" Water Diversion Policy Act.	Agree	Added text

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team	
No.	Reviewer Name	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
199	M Westbrook	1B1-20 Sec 9.2	At end of the discussion of PA 02-102 should also include discussion of subsequent public act that called for annual reporting on electronic form to be developed that has not yet happened. As such, the data gap identified at that time has not yet been filled.	Agree	Added
200	D. Radka	Page 20, 9.2, 1st paragparh	Ownership rights remain somewhat unsettled as a matter of law (CF for example, Kurt Strasser comments in proceedings of The Connecticut Water Law Conference [December 2, 2005]). Also, paragraph appears more opinion than merely fact-based.	Agree	Made some changes to help clarify and reduce tone.
201	Larry Bingaman, John Hudak	Page 20, Second line under Sec 9.2	Change "were exempt" to "are exempt"	Agree	Edited
202	Larry Bingaman, John Hudak	Page 20, 8th line under Sec 9.2	Change "various requirements" to "permitting requirements"	Agree	Edited
203	Bart Halloran	page 20, section 9.2	"In Connecticut, all water is "waters of the state" and owned by everyone, with the State acting as the steward" watershed of reservoirs are regulated by DPH not DEEP. MDC developed the watershed,dams and infrastructure to collect this drink water and therefore is owned by the MDC. Where is the authority for this broad statement?"	Disagree	This is a discussion about registrations not being water rights. It is recognized that MDC has a right to utilize its water per its registration.
204	Bart Halloran	page 20 sec. 9.2	Section 9.2 Disagree that holders of registered diversions have no rights to the diverted waters	Disagree	This paragraph is not stating that holders of registrations do not have a right to use the water.

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team	
No.	Reviewer Name	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
205	Bart Halloran	page 20 sec 9.2	Does this include impoundments authorized by registrations? Should identify, by way of example, the MDC exemption based upon the Farmington River management plan.	Needs Discussion	Needs clarification; the management plan isn't the reason for the exemption from permitting.
206	Bart Halloran	page 20, section	last sentence "This has made it challenging to effectively allocate water uses in drainage basins because it can be difficult to know how a water withdrawal has changed since its time of registrations" - this is an opinion. Is this statement necessary?	Agree	Added clarification but kept this intact, since the water utilities and environmental stakeholders all have said this.
207	V. de Lima	p. 20, sect 9.2, last line	It's not just how registrations have changed, but what they are.	Agree	Text added
208	D. Radka	Page 20, last bullet	"Modify" needs more context.	Agree	Clarified
209	D. Radka	Page 20, last para	Note subsequent legislation to allow data collection.	Agree	Edited
210	Larry Bingaman, John Hudak	Page 20, last paragraph	"Holders of registered water diversions are not subject to the annual water use reporting requirements like permittees" is incorrect. See Sec 22a-368a(b) as modified by PA 04-185	Agree	Added some clarification
211	DEEP	Pg 20, last para, last line	add "for registered diversions" after "data"	Agree	Added
212	DEEP	Pg 21, Para 1	change "stipulate a set of conditions for streams and rivers" to "classify each stream in the state according to degree of alteration by human use and define minimum flow standards for each class";	Agree	Edited
213	DEEP	Pg 21, Para 1	Change "are meant to cause" to "require"; delete "certain non-exempt"	Agree	Edited
214	DEEP	Pg 21, Para 1	Change "standards, including many" to "standards to support the instream habitat. It applies to"	Agree	Edited

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team	
No.	Reviewer Name	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
215	D. Radka	Page 21, 10.1 1st paragraph	Standards are "intended" to be protective of instream habitats.	Agree	Edited
216	D. Radka	Page 21, 10.1 last paragraph	Add, "By regulation, stream segments downstream from public water sources cannot be classified as Class 1 or 2."	Agree	Edited
217	DEEP	Pg 21, last para of 10.1	Delete "To date, none of the classified stream segments have been designated as Class 4." Multiple Class 4 segments have been requested and approved.	Agree	Edited
218	DEEP	Pg 21, last para of 10.1	add "or adjacent to public water supply well fields" to end of last sentence.	Agree	Edited
219	DEEP	Pg 21, 1st bullet	Change "believed" to "essentially"	Agree	Edited
220	D. Radka	Page 21, 3rd bullet	"Certain" Class 3 waterbodies require a variable release. Also, "During the R&G bioperiod," the release rate is adjusted. At end, add "Other Class 3 waterbodies require a release consistent with the R&G BQ80.	Agree	Edited
221	Larry Bingaman, John Hudak	Page 21, 3rd bullet	Not all Class 3 streams below dams will require a variable release. For example, streams with watersheds of ≤ 3 sq. miles or streams between reservoirs ≤ 1.5 miles are only required to release the R&G bioperiod Q80 year-round	Agree	Edited
222	DeJong	pages 21-22	as noted in IB4, streamflow standards do not include reference to groundwater withdrawals on streamflow and the history behind not including them with current regulations.	Needs Discussion	Might be better for the 1B4 paper?
223	V. de Lima	p. 22, 2nd ¶	"with initial reporting due in October 2015" Is this correct?	Not Applicable	Yes, this is correct

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
224	Larry Bingaman, John Hudak		Page 21, 2nd paragraph	Worth noting that by rule, stream segments below dams with registered or permitted diversions for water supply, or intersecting Level A aquifer protection areas cannot be classified as Class 1 or 2. The same applies for potential water supplies identified in regional or individual water supply plans, and where significant investment has been made.	Agree	Edited
225	Larry Bingaman, John Hudak		Page 21, last paragraph of Sec 10.1	Not correct that there have been no Class 4 streams designated. Of the basins classified thus far, three streams have received this designation	Agree	Edited
226	M Westbrook		1B1-21	Discussion of Stream flow regs - end last sentence at 'registered diversions' and delete that were otherwise exempt from environmental review; to be fair should mention that in satisfying these regs, will reduce safe yield of public water supply sources, regardless of amount registered or permitted; should mention that those regulations will have impacts on SY and MoS that will need to be considered by utility and in meeting DPH requirements for public water suppliers	Agree	Edited
227	DEEP		Pg 22, 2nd para	Why lots of detail on issuance of a draft and dates for comment, etc.? Simplify discussion	Agree	Deleted
228	V. de Lima		p. 22, sect 11, 1st ¶	"milestone energy legislation" is an opinion	Agree	Deleted
229	DEEP		Pg 22, box	add "calculated" before "bioperiod flows." for clarification	Agree	Edited

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
230	DEEP		Pg 22, 3rd para	This language needs to be simplified and taken out of regulation-speak. Note that only dam owners that are required to make releases have to submit a plan for making the releases (not all dam owners)	Agree	Deleted a few phrases
231	Bart Halloran		page 22, paragraph 4	re: PURA rate setting / WICA charges - not available to the MDC.	Agree	Added clarification
232	Bob Moore		12 Coastal area Management	extensive discussion but not sure of the significance other than climate impacts to coast	Agree	Like other sections, this can be moved to an appendix as this paper progresses and before it is incorporated to the State Water Plan
233	V. de Lima		p. 23, 2nd ¶	"weighing 8.3 pounds per gallon" What happened to "a pint's a pound the world around"?	Not Applicable	Yes. It's in a quote
234	D. Radka		Page 23, 2nd last para on energy	Conservation surcharge was expanded.	Agree	Added
235	DEEP		Pg 23, 3rd para	the WICA surcharge needs explanation on what it is and what it does	Agree	Added some text
236	Lori Mathieu	DPH	page 23 4th para sec 11	How is the WPC involved in this? I do not recall receiving an update on this	Other	Address outside the paper. This appears to be a recommendation (involved WPC with updates that involve water).
237	Larry Bingaman, John Hudak		Page 23., second to last paragraph of Sec. 11	Should reiterate here that PURA and WICA only apply to investor-owned water utilities	Agree	Clarified
238	M Westbrook		1B1-23	At end of Section 11 - need to update discussion of expanding WICA to reflect current law. Has been increased to 10% and eligible projects expanded to include, among other things, projects related to energy efficiency for utility (See Sec 16-262w)	Agree	Edited

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team	
No.	Reviewer Name	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
239	Martha Smith	pg 23, Section 12 Coastal Area Management	Coastal Area Management is inextricably linked to our fresh water resource management. Glad to see it included here! Need mention of the nitrogen trading/reduction program here or in the wastewater section--much effort goes into removing nitrogen from our streams and rivers to improve LIS water quality.	Needs Discussion	The nitrogen trading program will be added to the next iteration.
240	Larry Bingaman, John Hudak	Page 23, section 12	This section seem overly detailed on the Coastal Management Plan and should be edited to shorten and connect to how it applies to the state water plan	Not Applicable	How this will relate to the State Water Plan has yet to be determined
241	DEEP	Pg 23, Sec 12	The first paragraph seems like it should go at the end of the section, not the beginning.	Agree	The reason this paragraph is first is to allow the text box that calls into attention the fact that the State Water Plan and the Blue Plan are under development simultaneously (though at different paces).
242	DEEP	Sec 12	This section also has lots of references to public act numbers and years - not sure it is all needed, and makes it hard for public to read and understand. Maybe an appendix of some sort?	Agree	Like other sections, this can be moved to an appendix as this paper progresses and before it is incorporated to the State Water Plan
243	Larry Bingaman, John Hudak	Page 26, 7th bullet	The Stream Channel Encroachment Line Program statutes were repealed in 2013	Agree	Deleted
244	Bob Moore	13.1 Dam Safety	should add the ages of water supply reservoir dams and their ranking and if EAP's are available	Needs Discussion	Add this information where? For all water supply dams?
245	DeJong	28/para 1	consider reporting on the status of compliance	Needs Discussion	This information is relatively difficult to obtain because it is changing so quickly. Let's revisit closer to the end of the planning process, if desired.

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
246	D. Radka		Page 28, 3rd para, last sentence	"municipal water withdrawal" should be changed to "public water supply operation".	Agree	Edited
247	M. Westbrook		1B1-28 Sec 14	Should mention the activities by water companies that are exempt from IW review	Agree	Already mentioned briefly
248	Larry Bingaman, John Hudak		Page 28, last sentence	In some cases, state permits will override local inland wetlands jurisdiction, e.g., dam safety permits	Agree	Edited
249	Bob Moore		15. Waste Water Management	the discussion is weak on the controls and impacts of the many aspects of the programs including discharge load allocations , siting of surface and ground water discharges , etc,	Needs Discussion	This will be added for the next iteration. Specific suggestions would be helpful.
250	DEEP		Pg 29, 1st para	Delete "As noted by DEEP"	Agree	OK, but this came from DEEP.
251	DEEP		Pg 29, Para 2, last sentence	"the State's <u>initial Surface Water Quality Standards</u> were approved in 1970, <u>with Ground Water Quality Standards initially added in 1980</u> "	Agree	Added

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
252	DEEP		Pg 29, Para 4	<p>need to expand discussion of the CWF - suggested language: "Connecticut's Clean Water Fund (CWF) program was created in 1986. The CWF provides financial assistance in the form of grants and low interest rate loans to municipalities for their water pollution control projects. Typical projects funded through this program include water pollution control facility (WPCF) upgrades which include nutrient (nitrogen and/or phosphorus) removal, combined sewer overflow (CSO) elimination, sewer extensions to resolve pollution problems created by substandard septic systems, and sewer system rehabilitation of pipes and pumping systems. The CWF covers engineering services costs in the planning and design phase of project, and engineering and construction costs to build the project. The project financing is based upon state statute. Grants vary based upon the type of project and range from a 20% grant to a 55% grant. Project loans are at a 2% interest rate and paid back to the state over 20 years. Funding for the CWF program is from state general obligation bonds (pays for the grant), state revenue bonds (pays for the loan) and a federal capitalization grant (pays for grants and loans). Currently, the funding from the state represents 90% of the funding in the CWF program. The state legislature continues to provide strong financial support for the CWF.</p>	Agree	This was all added, with a few word changes to make it more factual and less absolute about future needs.

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
253	Bob Moore		15,3 Municipal Facility Planning	no discussion of the Clean Water Fund, the SRF and the Billion Dollar impact it has had and its use for the DWSRF spinoff, No discussion of the Nitrogen trading for LIS or other innovations in control that would be applicable to the plan,	Agree	Refer to DEEP additions above.
254	Bob Moore		15,5 subsurface sewage disposal	Should explain that Municipalities must assure the effective operation and maintenance of any new community sewerage system which has been effective in limiting their number and enhancing design and providing future funding for repairs, a similar program may reduce community water systems	Agree	Added the factual parts of this and softened the assumption.
255	DEEP		Pg 30, Sec 15.4	NPDES program delegated to CT - discussion should focus on CT's program. In addition, the SPDES program should be discussed	Needs Discussion	DEEP to provide some text
256	Bart Halloran		page 30 section	If regulations do not allow for discharge of wastewater to class A bodies and use of class B water bodies for drinking water is not permitted, Why are we discussing this issue?	Not Applicable	Discussion is here because it fits with wastewater management.
257	Lori Mathieu	DPH	page 30 last 2 para	Bob Scully to Comment	Needs Discussion	Bob Sculy to comment

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
258	Larry Bingaman, John Hudak		Page 30-31, Sec 15.5	Issues concerning on-site wastewater systems worthy of consideration include: 1) practice by developers of dividing a single contiguous major residential development site into multiple parts to avoid triggering DEEP permit requirements; and 2) potential impact of alternative wastewater systems on land use in sensitive areas due to facilitating development in areas or at densities where conventional septic systems would be infeasible.	Needs Discussion	These are ideal topics for the 1B4 paper, since they are challenges.
259	Larry Bingaman, John Hudak		Page 31-32, Sec 16	Should this section be consolidated with the climate change discussion in the Task 1B white paper?	Needs Discussion	Possible to move it
260	V. de Lima		p. 32, 1st ¶	MDC actively separating CSOs in Hartford	Not Applicable	This is happened in several places
261	Larry Bingaman, John Hudak		Page 32, Sec 17.2	Should be retitled "Commercial and Industrial Stormwater Pollution Prevention"	Agree	Edited
262	Larry Bingaman, John Hudak		Page 32-33, Sec 17.3	Could expound on UCONN CLEAR's upcoming MS4 municipal outreach program	Needs Discussion	Doesn't seem to fit this paper to go into that detail.
263	DEEP		Pg 32, last para	"DEEP-administered <u>stormwater</u> regulatory.."	Agree	Edited
264	Bart Halloran		page 33 paragraph 1	"The State's program requires each municipality to take steps to keep the stormwater entering its storm sewer systems clean before entering water bodies." this is an Impossible standard	Not Applicable	Discuss outside the paper.

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
265	Glenn Warner		Page 1B1-34	For bullets under the critical aspects in effective stormwater permit criteria: several of the bullets mention volume runoff as a parameter. No mention is mentioned of effects of basin size. The key is maintaining/enhancing infiltration capacity of soils-the "valve" of runoff rates.	Needs Discussion	These come from DEEP. Will need to address outside the paper.
266	V. de Lima		p. 34, sect 18.1	Add recreation in public water supply reservoirs; e.g., MDC system	Agree	Text added
267	Ryan Tetreault		1B1-34	The section on Recreational Management only focuses on DEEP regulated recreational areas; however public beaches in Connecticut are regulated by the local health departments/districts. There is more information to be included in this paragraph on public beaches on the DPH website program page for this topic: http://www.ct.gov/dph/cwp/view.asp?a=3140&q=387614&dphNav_GID=1828&dphPNavCtr=#47467	Needs Discussion	Not sure this is needed, especially since there are already comments about coastal waters not being relevant to the planning process.
268	DEEP		Pg 35, Para 3	Add "MA" after Pittsfield	Agree	Edited
269	V. de Lima		p. 35, sect 18.3, last ¶	reads like a suggestion or opinion	Agree	Deleted; the committees should soon determine where this point could fit into the State Water Plan
270	D. Radka		Page 35, last para	Delete - reads like advocacy.	Agree	Deleted; the committees should soon determine where this point could fit into the State Water Plan
271	M Westbrook		1B1-35	Delete last paragraph as that goes into intrests in the future and advocacy - not limited to current structure	Agree	Deleted; the committees should soon determine where this point could fit into the State Water Plan
272	DEEP		Pg 35, last para	Recommendations like these are not mentioned anywhere else in this chapter - should these be in a later chapter?	Agree	Deleted; the committees should soon determine where this point could fit into the State Water Plan

Task 1B1 Water Resource Mgmt

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
273	Larry Bingaman, John Hudak		Page 35, top paragraph	Change "is being supplanted" to "will be supplanted"	Agree	Edited
274	D. Radka		Page 36, 2nd para	Delete - non value-added.	Agree	But we kept parts of it
275	DeJong		36/para 3	nit - reorder to define EIE (later defined in para 3)	Agree	Edited
276	V. de Lima		p. 36, last 2 ¶s	identify EIE at first use	Agree	Edited

Contracting Agency: NEIWPCC
 Project Name: CT State Water Plan, Phase I

Project Manager: Kirk Westphal, CDM Smith
 Task Manager: Elaine Sistare, CDM Smith

Task 1B2 Conservation and Econ Trends

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
GENERAL COMMENTS (overall questions, input on items or topics to potentially be added, etc)						
1	Martha Smith		Municipal Planning Efforts that Affect Water Management	Some municipalities resist water and wastewater utilities because of the fear they will enable growth. Old Saybrook is an example that decided against centralized wastewater treatment because they didn't want intensive coastal development.	Agree	Added text
2	DEEP			Struggling with the organization of this paper - talk about POCDs, on to something else, then back to them at each level. Need to somehow frame differently, but don't know what to suggest.	Other	Because the papers will remain in working draft form for several months, this can be addressed as they are vetted. Edits were not made at this time.
3	Bob Moore		General	the discussion seems to miss needed facts, ie. Population projections; mapping of land use cover and development, location of water supplies, waste water sources, etc. The planning activities are interesting but perhaps should be an appendix, there is no discussion of brownfields or GC siting for certain activities	Needs Discussion	The paper was not meant to identify locations of water supplies, water systems, and wastewater systems. We assume that the reader will be somewhat familiar with these. The population projections can be added as an attachment. It would be helpful to understand what discussions would be desired relative to brownfields, etc.
4	M. Westtbrook		General	Would review to see if limited to facts and not wandering into opinions or suggestions that would be more appropriate in 1B3 on ptnetial management activites, in IB4 on conflicts and challenges or else dealt with later as recommendations in the body of the plan	Needs Discussion	The paper was reviewed for opinions and suggestions, and it appears to be appropriate in its current form. Specific recommendations will be addressed.
WHITE PAPER COMMENTS						

Task 1B2 Conservation and Econ Trends

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
5	Lori Mathieu	DPH	page 1 1.1	Part of 8-23 is to identify and protect public drinking water sources	Agree	A text box was added to paraphrase part of the statute including this item. Note that Section 1.3 mentions PA 85-279.
6	Larry Bingaman, John Hudak		Page 1, Sec. 1.1	Add mention of Secs 8-2 and 8-23 CGS mandating consideration of drinking water supply protection in POCDs and zoning regulations	Agree	A text box was added to paraphrase part of the statute including this item. Note that Section 1.3 mentions PA 85-279.
7	Bart Halloran		page 1 sec 1.1 2nd paragraph	delete word "instead" in last section of 2nd paragraph. Municipal plan of C&D should be updated every year. Also State plan should be coordinating and setting policy for development, by type, based on the water availability	Other	"Instead" was deleted. POCDs are not updated annually. A ten-year cycle is typical.
8	Lori Mathieu	DPH	page 1	PA 85-279	Agree	Section 1.3 mentions PA 85-279.
9	DEEP		Pg 1, Sec 1.2	Provide more context for (a) the requirement to do a Municipal Economic Development Plan and (b) how they are related to POCDs	Agree	Text added to Sections 1.2 and 2.1.
10	DEEP		Pg 1, Sec 1.3	Should this perhaps be sec 1.1 to be overall framing?	Disagree	POCDs need to be introduced before this discussion.
11	K. Burnaskas		1B2-1 Sec 1.3	include paragraph on the importance of watershed lands as buffers for clean drinking water - specifics to follow; this is in addition to paragraph in 3.5 under Green Plan	Disagree	This is covered in other places in all four papers.
12	Larry Bingaman, John Hudak		Page 2, Second to last paragraph of Sec 1.3	Also list Sec 8-2 CGS regarding consideration of source protection in local zoning regulations.	Agree	Text added.
13	M. Westbrook		1B-2-2	Discuss requirement for developers to notify water company of land use applications in aquifer or watershed areas	Agree	This was already in Section 1.5 but text was added to Sections 1.4 and 1.5 to clarify.
14	DEEP		Pg 2, Para 3	How are the various legislative acts related to the POCDs that are talked about before and after this paragraph?	Needs Discussion	This appears to be stated in the paragraph in its current form. Is there a specific recommendation?

Task 1B2 Conservation and Econ Trends

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
15	Larry Bingaman, John Hudak		Page 2-3, Sec 1.4	Add a bullet to describe requirements for developers to notify water companies of municipal land use applications on water supply aquifers and watersheds per Secs 8-3i and 22a-42f CGS	Agree	This was already in Section 1.5 but text was added to Sections 1.4 and 1.5 to clarify.
16	Bob Moore		1.5 water management programs	missing controls placed on land uses offered by water quality standards and ground water standards, and pollution control permitting	Needs Discussion	Note that the paper says "The above list includes only a few notable examples. In fact, many of the programs described in the 1B-1 paper have resulted in some type of linkage to municipal land use decisions. Despite the strong home rule tendencies, the State's municipalities are closely connected to water management programs and decisions made at the State level." If there is specific text that can be offered, it would be helpful.
17	DEEP		Pg 3, bullet 5	Water company delineates the Aquifer Protection Areas in accordance with the mapping regulations and the municipality must adopt the mapping and implement the land use restrictions at the local level	Agree	Clarification added.
18	D. Radka		Page 3, last paragraph and Page 4, 1st para	Move to "Challenges".	Disagree	This should be in both papers to help provide linkage.
19	Bart Halloran		page 4 sec 2.1 1st paragraph	recommendations should involve water availa	Not Applicable	This appears to be a recommendation to hold for the State Water Plan, rather than something that regional POCDs already do.
20	V. de Lima		p. 4, sect.2.1, 3rd ¶	Historically all the funding, and therefore emphasis, was transportation	Not Applicable	Agree, but not certain this needs to be stated.
21	Bart Halloran		page 4 sec 2.2	for COGs, water should be its own category	Not Applicable	This appears to be a recommendation to hold for the State Water Plan, rather than something that the COGs already do.

Task 1B2 Conservation and Econ Trends

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
22	Ryan Tetreault		1B2-4	To supplement the subdivision example provided in the discussion, I wanted to also reference a report to the Legislature required of Public Act 08-184 that specifically addresses the concerns with adequacy of private well supplies: http://www.ct.gov/dph/lib/dph/environmental_health/private_wells/pdf/recommend_to_cg_a_ensuring_adequacy_purity_of_new_pdww.pdf	Agree	Added as a footnote.
23	V. de Lima		p. 5, 2nd line	I think the "i.e."s should be "e.g."s	Agree	Changed.
24	V. de Lima		p. 5, sect 3.1	consider listing principles	Agree	Text added.
25	Lori Mathieu	DPH	page 5 3.1	Should have a section on history of the 1st stake C+D plan 1967, developed to protect sources of PDW (public drinking water)	Needs Discussion	Is this discussion available somewhere already?
26	Bart Halloran		page 5 4th paragraph	COG's are not organized state wide, C&D plan for state should decide where development occurs based on water resources.	Not Applicable	The second part of this sentence appears to be a recommendation to hold for the State Water Plan.
27	Bart Halloran		page 5 sec. 3.1	after last sentence in paragraph, Reference when the last time the state plan was updated and revised.	Agree	Text added.
28	V. de Lima		p. 6, 1st bullet, 2nd item	If it's a quote, so be it, but "ecosystems" is weird in this context.	Not Applicable	Agree.
29	M. Westbrook		1B2-6	Not sure you need all the detailed subobjectives listed under EDC	Disagree	There is only one page (total) for the state economic development planning, so we will leave this for the time being.
30	Bart Halloran		page 6	add bullets to grow the business objective - water, add water affordability to vibrant communities objective, add cost of water bullet to Invest in infrastructure objective	Not Applicable	This appears to be a recommendation to hold for the State Water Plan, since it's not in the State's economic development plan.
31	Lori Mathieu	DPH	page 7 3.4	Was the WPC involved in the development of this? Do not recall any DPH DWS involvement.	Not Applicable	No. Members are listed here: http://www.ct.gov/deep/lib/deep/climatechange/gc3/member_list_for_web_page.pdf

Task 1B2 Conservation and Econ Trends

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
32	Bob Moore		3.6 open space and land acquisitions	purchase of watershed lands and ground water protection areas could be priority. MDC has fund to continue acquire additional watershed by priority mapped areas	Not Applicable	The current program does seem to prioritize these lands. However, a possible recommendations to hold for the State Water Plan is to strengthen this prioritization.
33	M. Westbrook		1B2-11	Would add in something about the tax credits for open space donations or bargain sales that have encouraged permanent preservation of lands	Needs Discussion	This might be better in the strategies papers (1B3 and 1B4) since it doesn't appear to be part of the open space programs described.
34	V. de Lima		p. 12, 3rd full ¶, 2nd line	"but" implies opinion, consider replacing with a ;	Agree	Several changes made here.
35	D. Radka		Page 12, bullets	Mention DEEP 471 program.	Needs Discussion	This is meant to be a list of plans rather than programs. However, the Potable Water Program should be discussed in one of the papers, and it may not be. This can be addressed.
36	Lori Mathieu	DPH	page 12 first and 4th bullets	not reviewed by WPC	Not Applicable	This appears to be a recommendation to hold for the State Water Plan (that the WPC review all plans that address water).
37	Glenn Warner		Page 1B2-12	Mentions The Drought Preparedness and Response Plan. Suggest that clarify that it is more than "drought responses" in second bullet. It includes long term preparations to consider including structural (i.e. other than short-term, behavior) changes to consider.	Agree	Text added.
38	Lori Mathieu	DPH	page 12 drought plan bullet	not final	Agree	Text added ("draft").
39	Bart Halloran		page 12	add bullet to "Other statewide plans that are not described in this paper have the potential to affect water management. Consider the following" the effects of streamflow on future drinking water supplies, economic growth and drought conditions	Disagree	This is meant to be a list of plans rather than programs.

Task 1B2 Conservation and Econ Trends

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
40	Bob Moore		3.8 state land use approvals	Location of various discharge to surface and ground water are controlled by DEEP based on impact to surface and ground water and wetlands, GC areas provide the only areas for certain land uses such as landfill, etc.	Agree	This list is meant to be relatively narrow, and focused solely on land use approvals. Rather than casting these additions as land use approvals, a paragraph has been added beneath the bullet list.
41	DEEP		Pg 13	Discuss role of WQS in siting decisions - landfills, brownfields, restricts types of discharges that can occur to ground and surface water. APA program prohibits siting of land use activities that use hazardous material in wellhead areas. Watershed lands are protected through siting restrictions as well. Should CEPA also be discussed here?	Agree	This list is meant to be relatively narrow, and focused solely on land use approvals. Rather than casting these additions as land use approvals, a paragraph has been added beneath the bullet list.
42	The Nature Conservancy		1B2 - page 13	Regarding this sentence: "The DEEP's Flood Management Certificate is permit that must be sought and obtained for State-funded actions (including partial funding and federal funds that are administered by the State)."; it is our understanding that the Flood Management Certificate is for State Agency actions (only) that may affect floodplains or that impact natural or manmade storm drainage facilities. It no longer applies to all projects receiving State funds. The assessment of those project impacts are covered under other permit review.	Disagree	We will verify. Based on permitting actions we are familiar with (in 2016), the FMC is still being required for State-funded (or federal funded but passed through the State) projects,

Task 1B2 Conservation and Econ Trends

Reviewer				Consultant Team		
No.	Reviewer Name		Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
43	DeJong		page 13/bullet 1	in addition to the "availability" of water the type/priority selection of water (potable/non-potable) should be a Siting Council decision. This is mentioned in other white papers but perhaps could be added here (this is an issue of significance in the Pomperaug basin)	Not Applicable	This appears to be a recommendation to hold for the State Water Plan (that the siting council take this into consideration).
44	V. de Lima		p. 13, sect. 3.8, 1st bullet	Does the Siting Council get involved when transmission lines cross watershed lines?	Not Applicable	The siting council doesn't have a separate review for transmission lines that cross watersheds.
45	Larry Bingaman, John Hudak		Page 14, 2nd bullet	Population projections seem dated. There have been a number of recent reports of a net population loss trend in CT and Hartford, New Haven regions http://www.courant.com/business/hc-connecticut-population-20160519-story.html	Not Applicable	At this point, the paper discusses the two sets of projections that are available for formal planning. We believed the CT SDC projections are in the process of being updated.

Contracting Agency: NEIWPC
 Project Name: CT State Water Plan, Phase I

Project Manager: Kirk Westphal, CDM Smith
 Task Manager: Elaine Sistare, CDM Smith

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
GENERAL COMMENTS (overall questions, input on items or topics to potentially be added, etc)						
1	V. de Lima	S&T		This is a tough topic to keep from reading like these are recommendations. Suggest giving source(s) for these to minimize this.	Agree	We will work on this in future drafts
2	Bob Moore		general	the text includes some conclusions for solutions which may be valid but should be highlighted as such	Needs Discussion	Uncertain what this comment means
3	Larry Bingaman, John Hudak			Number formatting of sections needs to be looked at; some sections should be subsections of other sections, e.g., 2.8 Conjunctive Use of Groundwater and Surface Water is a subset of 2.7 Conjunctive Use of Surface Water and Groundwater. Same for 2.12, 2.13, and 2.14 re. additional storage.	Agree	We will work on this in future drafts; some changes have been made.
4				This section does not seem to have any discussion of agricultural uses	Needs Discussion	Ag water users can benefit from many of the approaches that are discussed. If there are additional means of supplying ag - different than those presented - they could be added. See also page 5 for the NRCS programs for ag.
5	M. Westbrook			There should probably be more detail on how wastewater solutions affect water quality and impact PWS needs; should note examples of shoreline towns and how they are addressing their situations with neighborhood systems vs large wastewater plants and/or those which continue with private septic systems	Needs Discussion	This paper is focused on how to identify additional sources of water supply or use less water (conservation as a source of water). It is not clear how additional wastewater discussions would help, outside of the section on reclaimed water.
WHITE PAPER COMMENTS						
6	DEEP		Pg 1, title	These are really potential water <u>supply</u> management activities	Needs Discussion	Yes; the first sentence of the paper states this. The title is consistent with the scope of services at this point.

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
7	Bart Halloran		page 1 paragraph	add to end of 1st paragraph "State of CT plan should be strategizing on best ways in utilizing the excess water resources available to solve a regional water deficiency rather than attempting to utilize localized excess capacities to implement streamflow regulations. Examples; All stream flow regulations implemented to date should have instead considered utilizing this same water capacity with interconnections or sales of excess water agreements to solve environment issues. i.e Copper mine brook, Fenton River"	Needs Discussion	Probably should be brought to the committees for discussion prior to editing the paper.
8	Lori Mathieu	DPH	page 1, 1.1 water conservation: first paragraph	after the word "several"... insert "public health"	Agree	Text added
9	M. Westbrook		1B3-1 Sec 1.1	shoud add benefit of reducing pressure to develop additional sources of supply	Agree	Text added
10	Bart Halloran		page 1	add the words "and distribution" to the end of the last sentence of 1st paragraph	Disagree	Does not fit the focus of the paper
11	The Nature Conservancy		1B3 - page 1	<p>in listing the benefits of water conservation, the considerable savings in energy costs and the benefits to headwaters should be noted, in the following paragraph:</p> <p>"Water savings from water conservation can act to reduce future water demands and therefore avoid or postpone the design and construction of new water supply and wastewater facilities. In addition, water conservation may serve several environmental benefits such as:</p> <ul style="list-style-type: none"> • Leaving additional water in streams especially small tributaries AND HEADWATERS. • Reduce wastewater flow and have a positive water quality impact. • REDUCING USE OF ENERGY TO PROCESS, PUMP, AND/OR HEAT WATER" 	Agree	Text added except for "and headwaters" which was deleted as noted below.

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
12	Lori Mathieu	DPH	page 1, 1.1 water conservation: first paragraph	Add additional bullet points -assure sufficient supply during dry conditions -reduce energy	Agree	Text added
13	Bob Moore		1.1 water conservation	where do the % achievement in water conservation come from and do we have data to show it? We need to show the impact on current demand and results from conservation. Is there any enforcement measures in place? We need actual data to support the conservation, leak detection and repair and results. The Data on the design standard of 75 versus 30 gpcpd needs supporting proof. need impact of lawn irrigation and regulation.	Needs Discussion	Supporting data can be provided, and some of it is from the WUCC data collection, but adding significant detail here could unnecessarily weigh down this paper.
14	DeJong	S&T	page 1/sec1.1/1st bullet	"...especially small tributaries" is believed not to be inaccurate (or at least incomplete). Conservation (the cumulative impact) positively impacts larger river streamflow	Agree	Edited
15	DeJong	S&T	page 1/sec 1.1	"M&I" is not believed to be commonly used in CT and just a caution that it may require more dialog going forward	Agree	The sentence "Municipal and Industrial (M&I) is a term that encompasses public water system water needs as well as industrial water needs (including industries that are served by public water systems, or that rely on their own sources of supply)" was added to the paper during internal review (prior to the initial committee review) to address this concern.
16	V. de Lima	S&T	p.1, sect. 1.1, 3rd ¶, 5th line	should "time" be "fixtures"? If not, how is it different from behaviors?	Agree	Edited
17	Larry Bingaman, John Hudak		Page 1, 4th paragraph	This states that conservation efforts can be effective with little cost to the community. Depending on the level of effort there are variable costs in implementing conservation programs and any resulting loss of utility revenue will be passed onto water ratepayers.	Agree	Edited

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
18	M. Westbrook		1B3-2	Not sure that the M&I concept well known/used in CT; where are the numbers of % reduction in each category from?	Agree	The sentence "Municipal and Industrial (M&I) is a term that encompasses public water system water needs as well as industrial water needs (including industries that are served by public water systems, or that rely on their own sources of supply)" was added to the paper during internal review (prior to the initial committee review) to address this concern.
19	Larry Bingaman, John Hudak		Page 2, 1st set of bullets	Is there a source/citation for the reported percent water demand reductions?	Agree	This will be provided
20	V. de Lima	S&T	p.2, 2nd bullet	Is this an additional 1% or a total of 9%?	Agree	This will be provided
21	V. de Lima	S&T	p. 2, 3rd bullet	What is "mater-meter"?	Agree	typo addressed
22	Larry Bingaman, John Hudak		Page 2, 1st sentence under Evaluating New Supply....	Please clarify the meaning of this sentence "The ability to develop new supplies from water conservation or to carry over conserved water for later use is dependent on the local utility.	Agree	Edited
23	M. Westbrook		1B.3-2 to 3	There should be discussion under Evaluating New Supply from M&I about the impacts on operating revenues of utility vs. the capital costs/savings. The effect will vary whether PURA regulated or not but still a significant consideration.	Agree	A new paragraph was added
24	Larry Bingaman, John Hudak		Page 2, 3rd bullet under Evaluating New Supply...	Funding conservation programs are part of rates, which requires approval from governing or regulatory entities, e.g., utility or municipal boards, PURA, etc.	Agree	Text added
25	Bart Halloran		page 2 paragraph 5	Are these percentage reductions in water usage aggregated or cumulative as you progress from one level to another?	Agree	This will be provided
26	Bart Halloran		page 2 paragraph 7	"The ability to develop new supplies from water conservation or to carry over conserved water for later use is dependent on the local utility" You are still relying upon modifications in behavior, which can change at any time.	Agree	No edit

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
27	Glenn Warner	S&T	Page 1B3-2	None of the Levels seem to capture the large losses due to infrastructure leaks in the distribution system, i.e. the unaccounted water that may be on the order of 30% per some sources before it reaches meters. Also the need for adequate and accurate (maintained) meters could be mentioned.	Disagree	Several of the levels mention leak detection.
28	DEEP		Pg 3, 1st bullet	delete "from river or stream"	Agree	Edited
29	Larry Bingaman, John Hudak		Page 3, 3rd bullet	Change "water storage" to "water supply". Storage could also include distribution system tanks, etc.	Agree	Edited
30	D. Radka		Page 3, bullets	Downside should be noted as well, such as challenge of getting customer buy-in, and impact on revenue.	Agree	Addressed with the new paragraph
31	Larry Bingaman, John Hudak		Page 3, last paragraph	Should discuss the Energy Policy Act of 1992 and the resulting changes on the plumbing codes and water use. These likely had far more impact than Water Supply Regulations and diversion permit conditions. For example since the early 2000s the RWA experienced an average decline in water demand of about 1% per year from 2000-2015, representing a total of 11 MGD, or a water savings of about 4 billion gallons/year	Agree	Edited
32	M. Westbrook		1B.3-3	last paragraph would use another more objective word besides 'enjoying' in discussion of non-revenue figures and per capita demand - seen? Realized?	Agree	Edited
33	Lori Mathieu	DPH	page 3 last paragraph	correct the date range " in the 1990's" with the year "1986"	Agree	Edited
34	M. Westbrook		1B-3.4	Would include discussion of PURA Water Revenue Adjustment ratemaking tool and specific charge under Sec 16-262y and other provisions of PA 13-78	Agree	Text will be added
35	DeJong	S&T	pages 3-4	consider the addition of newer regulations allowing private water utilities to adjust rates based on conservation practices and resulting demands	Needs Discussion	Possibly address outside the paper. Does this mean rate adjustment without PURA consent?
36	DEEP		Pg 3, last para	How do these numbers compare nationally?	Agree	Text will be added

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
37	M. Westbrook		1B3-5	This section should mention ongoing efforts by utilities to promote conservation and some of the programs that now provide incentives for customers. While not as widespread or universal as the energy programs, there are things going on now	Needs Discussion	Need some examples
38	D. Radka		Page 4, 1st para	Delete first part of 2nd sentence and start with "Most consumers are accustomed..." Also, add "normal operating costs" to water utility needs.	Agree	Edited
39	Bart Halloran		page 4 paragraph 1	Water utilities are unable to suggest new ideas or techniques in their Water Conservation Plans - why? Also add to last sentence "particularly public water utilities which are not permitted to include a water conservation surcharge to compensate for revenue reductions due to conservation."	Agree	Edited
40	DEEP		Pg 4, para1	need to talk a little more about conservation catch-22 and impacts to revenue and what can be done to address	Agree	Text added
41	Glenn Warner	S&T	Page 1B3-4	Need to address how to provide for incentives for conservation at the utility level, i.e. address the inherent conflict between promotion of conservation and the potential loss of revenue. Mention the Investor-owned utility regulations that are under way (I forget the correct name of program but was approved about 3 years ago to separate fixed vs. operating costs of supplying water. It only affects investor-owned, but could it be expanded ?)	Agree	Text added
42	Larry Bingaman, John Hudak		Page 4, 1st paragraph	I don't understand the statement: "Water utilities are unable to suggest new idea or techniques in their Water Conservation Plans..."	Agree	Edited
43	Bart Halloran		page 4 paragraph 5	Is NRCS defined elsewhere?	Agree	Text added
44	DEEP		Pg 4, para 7	what is stormwater capture at a residential level? Rain barrels? Rain gardens?	Agree	Text added

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
45	Larry Bingaman, John Hudak		Page 4, Individual Water User Level Conservation	Another opportunity to discuss the EPA of 1992 and plumbing codes. Also should describe EPA WaterSense products, which are widely available and go beyond the EPA of 1992 standards.	Needs Discussion	
46	DEEP		Pg 4	Is there anything innovative coming out of other states on the residential front for conservation?	Needs Discussion	Will look into this
47	DEEP		Pg 5, incentives	what does a pool cover rebate do for conservation?	Agree	Text added
48	V. de Lima	S&T	p. 5, "Incentives"	reads like a suggestion	Agree	This seems OK in this context. Incentives for water conservation are not out of the question for CT.
49	DEEP		Pg 5, Para 4	a number of the items listed aren't strategies - e.g "watershed"	Agree	Edited
50	Glenn Warner	S&T	Page 1B3-5	Under Incentives for Water Conservation: I suggest that there is a need to review and update periodically (annually?) the Building Code to assure that the most efficient water saving devices are required in addition to discussion of rebates, etc. Low flow devices have been greatly improved in recent years in both their water use savings as well as being much more efficient from a maintenance standpoint.	Agree	Text added
51	V. de Lima	S&T	p. 5, 3rd ¶	missing footnote	Agree	Formatting will be addressed
52	V. de Lima	S&T	p. 6, sect. 1.3	needs editing	Needs Discussion	Specific suggestions are needed
53	Lori Mathieu	DPH	page 6 section 1.3 first paragraph	water supply + wastewater plans?	Needs Discussion	Benefit of mentioning wastewater is uncertain here, as the paper is focused on water supply
54	Lori Mathieu	DPH	page 6 section 1.3 second paragraph	after, "supply sources, storage, and treatment." add "plus conduct water supply planning"	Agree	Text added
55	DEEP		Pg 6, Para 3	Should be "water quality <u>management</u> ", "climate change <u>planning</u> "; not sure what "place making" is.	Agree	Edited
56	DEEP		Pg 6, last para	Might want to specifically mention "cluster development"?	Agree	Text added

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
57	DEEP		Pg 7	Should we mention the "ENVISION" Infrastructure sustainability concept?	Needs Discussion	It would be relevant, but would it be too much for a paper striving for conciseness?
58	Bart Halloran		page 7	add bullet "Economic growth, job creation and public revenue enhancement." after paragraph 3	Needs Discussion	There is not a bullet list here
59	Bart Halloran		page 7 section 1.3	The only way this will be addressed is if the State, OPM, develops C&D on a regional basis instead of town by town considering Water availability as a major criteria in siting development	Other	For discussion in the planning process, and possible recommendation of the State Water Plan.
60	V. de Lima	S&T	p. 7, sect.1.4, 4th ¶	Either I'm missing some point, or this is redundant	Agree	Edited
61	Lori Mathieu	DPH	pg 8. first and third sentence	change "human consumption" to "public drinking water"	Agree	Edited
62	D. Radka		Page 8, 2nd sentence	Not sure Class B could "easily provide" massive amounts of non-potable water. "Potentially" provide, maybe?	Agree	Edited
63	Lori Mathieu	DPH	pg 8 second sentence	change 22a-426 to 22a 417	Agree	Edited
64	DEEP		Pg 8, Para 1	This is not stated quite right. Replace paragraph with "Section 22a-417 of the CGS prohibits discharge of sewage to water supply impoundments. Therefore, Class B streams, which are designated in accordance with the CT Water Quality Standards to, in part, receive and assimilate treated wastewater, are not utilized for public drinking water supply. Class B streams, such as the Connecticut River and Housatonic River, are the larger streams in the state, so could potentially provide substantial quantities of water for non-potable uses. "	Agree	Edited
65	Bart Halloran		page 8 section 2.1 paragraph 1	add the word "wastewater" prior to "discharges	Agree	Edited

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
66	M. Westbrook		1B3-8 Sec 2.1 2nd paragraph	This section should include a discussion of the public health policy for restriction on use of class B waters and how that has affected water quality of drinking water/source protection efforts. 2nd paragraph, would not characterize as 'many large water utilities..'; Don't think use of class B rivers is such a clear option, would qualify that discussion with something like "depending on the proximity to such sources, the adequacy, quality and availability of the supplies, and permitting considerations." ; The quality of the supplies required to be used in these plants is not insignificant	Agree	Some text added.
67	M. Westbrook		1B3-8 Sec 2.1 3rd paragraph	would change the qualifier from "more challenging" to something stronger -- very difficult? Costly? Near impossible? Scenario of using class B for some of a customers' needs. Also, last sentence in that paragraph should note "and consideration should be given to the impacts on ratepayers and users of systems where redundant piping would be required and affects on growth and economic development."	Agree	Text added
68	Lori Mathieu	DPH	pg 8 third paragraph end of 5th line	doesn't every state? (referring to line regarding CT having provisions to prevent cross connections between potable and non potable water.) Should outline why provisions are in place	Agree	Text added
69	Larry Bingaman, John Hudak		Page 8, 3rd paragraph	Using Class B waters for modern power plants may not be as easy as implied. Highly pure water is needed for emissions controls (Bob Silvestri, PSEG Inc. & WPCAG member, pers. Communication)	Agree	Text added
70	Lori Mathieu	DPH	pg 8 third paragraph end of last 2 lines	Are they? Very subjective statement	Other	Yes, this is costly.
71	DeJong	S&T	page 8	amend the discussion on Towantic. Water is needed continuously for cooling. Additional significant water is needed for air emissions during oil-fired operation. As stated earlier, non-potable water should have received a priority review for the facility.	Agree	Text added

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
72	DEEP		Pg 8, Para 3	Are separate potable/non-potable systems being installed on a parcel or neighborhood scale elsewhere in the country? If so, what is driving it?	Other	Yes; water supply shortages are driving this.
73	M. Westbrook		1B3-8 Sec 2.1 4th paragraph	Revise that wording so it is not so value laden (great strides??) and more objective like "There have been situations where non-potable sources have been used for non-potable needs but there are still large users that rely on public water supply for their needs including..... Also need to update the description of Towantic project -- it has been approved and is under construction, I think entirely fed by pws; discuss in the nursery item the implications of FDA requirements for water quality in ag operations and how those are affecting choices for water supply	Agree	Edited
74	M. Westbrook		1B3-8 Sec 2.1	Somehow there needs to be recognition/discussion of the costs of use of Class B waters even for non potable use - both with the infrastructure and delivery systems of the nonpotable water but also to the extent that utilities may have made investments in plants and facilities(paid for in customers' rates) to serve an expected demand that may not materialize because of a change in state policy. How are those 'stranded assets' accounted for?	Needs Discussion	This can be addressed at a later time in the planning process.
75	Lori Mathieu	DPH	pg 8 4th paragraph; before bullets	How? What great strides?	Agree	Edited
76	Bart Halloran		page 8 paragraph 4	What strides has the State already taken?	Agree	Edited
77	Martha Smith		Impervious surface reduction & LID/Green Infrastructure	Topic could be highlighted more as water management tool for stormwater & flood reduction, effects on stream baseflows	Disagree	In this paper, we have tried to remain focused on water supply options.
78	DEEP		Pg 9, Para 1	Need more info here, or delete section	Agree	Combined with other section
79	V. de Lima	S&T	p. 9, sect. 2.2	unclear	Agree	Combined with other section

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
80	Bob Moore		2.1 Use of Class B Water	Are there any power producers using drinking water for cooling? Hydro facilities can use reservoir water through turbines prior to treatment. This general discussion seems advocate what is already happening with major rivers? Not sure two examples show the problem.	Agree	Some clarification about the examples was added.
81	Glenn Warner	S&T	Page 1B3-9	Under 2.3 Non-potable Reuse, there is an emphasis on use for irrigation. However, there are other uses, e.g. cooling/heating systems and dual supply for toilets, etc., i.e. purple pipe in (mostly) new construction. Next page mentions the Uconn reclaimed water but fails to mention that uses include the use in new buildings through purple pipes.	Agree	Text added
82	V. de Lima	S&T	p. 9, sect. 2.3	what is "consumable effluent"?	Agree	Text added
83	V. de Lima	S&T	p. 9, sect. 2.3, 6th bullet	irrigation and a bunch of other stuff; e.g., snowmaking	Agree	Text added
84	Lori Mathieu	DPH	page 9 last sentence	...and also to be used potentially for gray water in new buildings + field irrigation	Agree	Text added
85	V. de Lima	S&T	p. 10, 1st ¶, 2nd to last sentence	"...UConn, and available land..." Implies State land. Yes, UConn land would be state land, but...	Agree	The availability of state land was significant for this project.
86	M. Westbrook		1B3-10 Sec 2.5	A mention here about the cross connection considerations previously discussed would be appropriate	Agree	Text added
87	Larry Bingaman, John Hudak		Page 10, 2nd paragraph under Sec 2.5	Dish water would not be grey water, as kitchen sinks or others that would normally come in contact with food are not included in the definition (see LEED).	Agree	Clarified
88	D. Radka		Page 10, 2.4, last para, last sentence	"These, along with the O&M expense of operating such a facility, are significant barriers".	Agree	Text added
89	V. de Lima	S&T	p. 10, sect. 2.5, last ¶	stormwater is described BELOW	Agree	Deleted
90	DEEP		Pg 10, Para 4	We've been thinking about use of treated wastewater for cooling for power plants - what is the potential there?	Needs Discussion	May be able to add text for this

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
91	Lori Mathieu	DPH	pg 10 4th paragraph	this needs expansion + additional thought	Needs Discussion	May be able to add text for this, but some of the discussion might be more appropriate in Phase II
92	Lori Mathieu	DPH	pg 10 7th paragraph	explored further	Agree	Some text added.
93	DEEP		Pg 10, Para 7	When might a gray water system make sense? Any examples?	Agree	Some text added.
94	Lori Mathieu	DPH	pg 10 8th paragraph	wastewater + potable water- should clarify	Agree	Some text added.
95	Lori Mathieu	DPH	pg 11 1st paragraph	wastewater?	Needs Discussion	Comment is unclear
96	M. Westbrook		1b3-11 2nd paragraph	note in the disucssion of higher level of review -- rather than calling it rare, explain that it is required when state funds used for such projects (Middlebury, UCONN, others are out there so not necessarily 'rare')	Agree	Clarification added
97	M. Westbrook		1B3-11 3rd par	add something at end that 'Proponents further note the potential benefit of moving water from water rich areas to more environmentally stressed areas to reducing impacts from developing additional supplies in areas where there may be demands.'	Agree	Text added
98	Bart Halloran		page 11 paragraph 4	Why not reference the WUCC process to effectively achieve the balancing of water needs?	Agree	Text added
99	DEEP		Pg 11, sec 2.7	The concept of ground water basins that can be recharged by surface water, and of non-renewable aquifers has very limited (if any) applicability in CT since our aquifers are shallow, unconfined (or at most, semi-confined) and well connected to the surface water system. However, the concept of utilizing both ground water and surface water supplies together makes sense.	Agree	Understood, but the paper presents the concept to avoid the appearance that options were missed.

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
100	V. de Lima	S&T	sects 2.7 - 2.10	I don't think these sections are pertinent to CT, as written. I understand the intent of these sections is to present ALL options available, but when presented in the context of CT, they should be relevant and feasible for CT. Also, some of the terminology is not typically used here. I have been discussing this with Kirk W. and David M. I've taken a stab at rewriting the sections, keeping as much of the original as I could. I have included input, seen in this spreadsheet, from John Mullaney and Glenn Warner. (As you know, they are both on the S&T committee and represent USGS and UCONN, respectively.) The suggested rewrite is attached.	Agree	Incorporated.
101	Larry Bingaman, John Hudak		Page 10-11, 2.7 & 2.8	While we agree with the concept of using interconnections to balance water supply, it is unclear what is envisioned here regarding conjunctive use of surface and groundwater. Is it designing and constructing systems to divert surface waters to infiltration basins, or operating a distribution system or interconnections to alternate between surface and ground water systems to optimize supply and stream flow?	Agree	More of the latter: conjunctive use is operating surface water supplies and groundwater supplies when most practical to maximize yield while minimizing impacts. Text was rearranged to help clarify.
102	Bob Moore		2.7 Conjunctive use	not sure ground water recharge to aquifers is viable in state?	Agree	Understood, but the paper presents the concepts to avoid the appearance that options were missed.
103	D. Radka		Pages 11,12 &13	Many options are not practical within CT.	Agree	Understood, but the paper presents the concepts to avoid the appearance that options were missed.
104	DeJong	S&T	page 11	include recent DEEP initiative on ESAs	Disagree	This is a moving target. Perhaps something else could be added.
105	John Mullaney	S&T	1B3-11 2.7	We don't really use the term "groundwater basin in Connecticut"- aquifer is preferred. I also think of this optimization in terms of the timing of groundwater pumping, and the time delay between pumping and the effects on streamflow, which will vary with distance and transmissivity.	Agree	Virginia's edit address this.

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
106	Glenn Warner	S&T	Page 1B3-12	The wording at the top of page regarding "prevents groundwater depletion by maintaining baseflow" appears to assume that baseflow could be manipulated by reservoir releases. In CT it is usually a matter of maintaining baseflow by preventing groundwater depletion along our smaller (e.g. 3rd order) streams. Except for very short reaches, almost all streams in CT are gaining streams. Also in 4th paragraph regarding consolidated bedrock deposits: CT has few deep, extensive confined aquifers. The fractured bedrock aquifers are locally recharged, although at a slower rate than the stratified alluvial aquifers.	Agree	Virginia's edit address some of this, and additional text was added.
107	John Mullaney	S&T	1B3-12 2.7	I think you need to mention that these are generally glacial aquifers rather than alluvial	Agree	Virginia's edit address this.
108	John Mullaney	S&T	1B3-12 2.7	We don't consider bedrock aquifers to be non-renewable in Connecticut, at least in the way and depths we are currently using them.	Agree	Virginia's edit address this.
109	Bart Halloran		page 12 section 2.8 paragraph 6	groundwater streadier than even when compared to the deep surface water reservoirs of the MDC?	Agree	Clarification added
110	Bob Young		1B-3 Section 2.9 1st Paragraph	Specific reference is made to the Middletown Roth Wellfield as being an example of induced infiltration and riverbank filtration. The Middletown Water Dept (MWD) has had scientific studies performed to determine if this wellfield in Under the Influence of a Surface Water. Those studies have indicated that these well are NOT under the influence of a surface water. Therefore, MWD formally requests that this specific reference be removed from the White paper.	Agree	While we believe this reference is OK without jeopardizing the GWUDI determination, it has been removed.

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
111	Larry Bingaman, John Hudak		Page 13, 2nd paragraph	Returning pre-SDWA reservoirs to active use in part to reduce stress on wellfields, would come with substantial costs for designing, building, and operating new filtration plants. There could also be significant and very difficult environmental and social conflicts to address when reactivating these sources (e.g., RWA's new Lake Whitney WTP in late 1990s to mid 2000s http://www.nytimes.com/2000/01/30/nyregion/how-to-build-a-water-plant-very-carefully.html?pagewanted=all&_r=0).	Agree	Text added
112	The Nature Conservancy		1B3 - page 13	In this sentence: "The State actually has several examples of riverbank filtration, such as Middletown's Roth Wellfield, although the aquifer thicknesses and pathways traversed (from riverbed to wells) are more substantial in Connecticut than they are in many other situations in the United States."; does "situation in the United States" mean "other states"?	Agree	Word changed to "settings"
113	John Mullaney	S&T	1B3-13 2.9	I think that most of our high capacity wells are placed to take advantage of induced infiltration, rather than the few large examples mentioned.	Agree	Virginia's edit address this.
114	Lori Mathieu	DPH	pg 13 7th para	compliance w/ the SDWA surface water treatment	Agree	Clarification added
115	DEEP		Pg 14	Combine Sections 2.12 and 2.13	Agree	Combined
116	DEEP		Pg 14, Sec 2.10	ASR has little applicability in CT, and probably doesn't warrant discussion in the Plan.	Agree	Understood, but the paper presents the concept to avoid the appearance that options were missed.
117	John Mullaney	S&T	1B3-14 2.9	Perhaps some discussion of the limited ability in Connecticut to store additional groundwater due to shallow water tables.	Agree	Text added
118	DEEP		Pg 14-15	In addition to reservoir storage, should other types of storage be discussed?	Needs Discussion	Potential to include this.
119	Lori Mathieu	DPH	pg 14 1st para second sen.	why not expected?	Agree	Clarification added
120	Lori Mathieu	DPH	pg 14 2nd para third sen.	should outline why it is important	Agree	Text added

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
121	Lori Mathieu	DPH	pg 14 2.11	good example	Agree	No edit
122	M. Westbrook		1B3-14 and 15 Sec 2.13 and 2.14	The suggestion that new storage projects or expanding of existing storage facilities is a likely or cost-effective solution in CT in just not realistic. There are significant impediments with costs, permitting and conflicting positions of state and federal regulators that make this extremely difficult (nearly impossible) to achieve. The expansion of Killingworth Reservoir, driven by orders for dam improvements, took more than a decade to permit and had considerable costs and permitting challenges.	Agree	The paper does not avoid these issues; this should lead to good discussions in the planning process.
123	DEEP		Pg 15, 10th bullet and pg 16, 4th bullet	We don't typically talk in terms of acre-feet, more in mgd or bgd in CT.	Agree	Edited
124	Glenn Warner	S&T	Page 1B3-15	The potential conflicts include concerns with dam safety and the costs associated with adequate spillway capacities.	Agree	Text added
125	Glenn Warner	S&T	Page 1B3-16	I believe that Mansfield Hollow Reservoir is usually called Mansfield Hollow Lake (even though it is a reservoir)- Need to check. I think the Willimantic Reservoir which receives the outflow from MHL, diverts a relatively small part of the MHL discharge even under low flow conditions. But need to check on that.	Agree	Edited
126	V. de Lima	S&T	p. 16, sect. 2.15	Mention that if COE flood control reservoirs are used for public supply, supply would be secondary. In other words if COE needed to dump water from the reservoir to create storage in anticipation of a major storm, they would do so and the availability of supply could be affected.	Agree	Paragraph added
127	Glenn Warner	S&T	Page 1B3-16	Perhaps should state the inherent conflicts in reservoir management for the goals of flood control (you want water level to be kept low as possible for flood storage potential) vs. water supply (you want the water level to be as high as possible as much of the time as possible for drought periods).	Agree	Text added

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
128	D. Radka		Page 16, 5th bullet, last sentence	Add ", or have small watersheds that do not allow for proper refill."	Agree	Text added
129	Larry Bingaman, John Hudak		Page 17, Sec 2.16	Water utilities with multiple reservoir systems with an interconnected distribution system may be able to apply the same concept as flood skimming by maximizing use of run of the river reservoirs during typical high flow seasons (winter, spring), and reducing withdrawals from other reservoirs to promote refilling for serving high demands during summer months.	Agree	Paragraph added
130	Glenn Warner	S&T	Page 1B3-17	Under stormwater capture- perhaps could use "water harvesting" as additional term.	Agree	Text added
131	Bob Moore		2.15 Flood Control Reservoirs	The West Branch Reservoir for MDC is below the Flood control reservoir. The west Branch reservoir also maintains the flow in the Farmington River for Fisheries, recreation, power and wastewater assimilation. There is available water in the combined reservoirs for future supply.	Agree	Paragraph added
132	Larry Bingaman, John Hudak		Page 17, Sec 2.17	Yale's Kroon Hall is an example of stormwater capture, where rooftop runoff is used to supply toilets and irrigation.	Agree	Text added
133	Martha Smith		Pg 17-19, Sect 2.18	Do we need such a long discussion of desalination? This seems more an outlier option, given the regulatory obstacles, energy costs and the availability of fresh water supplies.	Agree	Understood, but the paper presents the concepts to avoid the appearance that options were missed.
134	M. Westbrook		1B3-18	Costs is a major implementation issue for desal projects that should be noted (funding implies someone else pays for it, but is it at a reasonable/prudent cost?)	Agree	Text added
135	Larry Bingaman, John Hudak		Page 18, Major Implementation Issues	Cost and energy demands of desalinated water is a major issue and needs mention	Agree	Already mentioned

Task 1B3 Potential Mgmt Activities

Reviewer					Consultant Team	
No.	Reviewer Name	Affiliation	Page, Section No., Paragraph	Comment	Response	Resolution Detail, as applicable
136	DEEP		Pg 18	Can discussion of the major implementation issues for desal be explained a little more? I believe energy costs and disposal of the brine are the two big issues? East Lyme evaluated desalination as an option not too long ago.	Agree	Text added
137	V. de Lima	S&T	p. 17-19, sect.2.18	This section should start with the caveat that desalination in Connecticut may not be possible because of limits on class B water.	Agree	Clarification added
138	Lori Mathieu	DPH	pg 19	not legal due to 22a-417 -waste receiving -many public health concerns/issues -lack of SW protection - no land use control -water quality control difficult	Agree	Clarification added
139	Glenn Warner	S&T	Page 1B3, page ?	No mention is made under Section 2 Supply Management Alternatives of the general availability of large amounts of ground water in the alluvial aquifers along major rivers in the state, e.g. CT River, Thames, etc. These aquifers have the advantage that ground water depletions have minimal impact of baseflow; although there could be impacts on local wetlands or other wells in the vicinity.	Needs Discussion	This is a valid point, but using groundwater from alluvial aquifers is already prevalent. The question is whether this paper should further promote these aquifers as a "new" source of supply in the context of changing conditions or a changing climate.