Town of Simsbury

933 HOPMEADOW STREET P.O. BOX 495 SIMSBURY, CONNECTICUT 06070

Mary A. Glassman ~ First Selectman

January 22, 2013

Mr. Jason M. Coite
University of Connecticut
Office of Environmental Policy
31 LeDoyt Road, U-3055
Storrs, CT 06269-3055

Dear Mr. Coite,

As the municipal leaders of the Farmington Valley towns, we would like to express our appreciation to the University of Connecticut for agreeing to extend the comment period and for holding this hearing tonight on the Metropolitan District Commission plan to divert water from the Farmington River watershed to supply the growing needs of the Storrs campus. We appreciate the openness of the process.

We also write to express our serious concerns regarding the MDC proposal to take water from the Nepaug and Barkhamsted reservoirs and, as stated in the MC strategic plan, to tap the west branch of the Farmington River if needed. We believe this plan will have an adverse impact on the residents of the Farmington Valley. While we support the water resource needs of the Storrs-Mansfield region, we believe that better and cheaper alternatives to the MDC proposal exist. We also believe that a long term plan should be in place prior to the installation of a 20-mile pipe.

As you may know, the towns in the Farmington Valley and the Capitol Region work very hard to plan and to act on a regional basis. In contrast, the UConn-MDC proposal seeks a massive transfer of resources from one part of the state to another without any thought-through and agreed-to plan.

It its comments to UCONN, the state Council on Environmental Quality asked, "What is the plan that the proposed project supports?" The Council found that it was "not clear as to what, if any, regional water plan this project advances" and observed that it "has long been established in state policy that major expansions of service areas should not be conducted project by project, for economic and environmental reasons, but should be conducted to further well-conceived regional plans."

We respectfully submit that the water needs of UConn-Storrs and Mansfield should be done in the context of a state plan to address regional water needs and not as a reactive quick-fix. The MDC plan should not be implemented before a regional analysis and impact study have been completed.

Telephone (860) 658-3230
Facsimile (860) 658-9467

MGlassman@simsbury-ct.gov
www.simsbury-ct.gov

An Equal Opportunity Employer
8:30 - 7:00 Monday
8:30 - 4:30 Tuesday through Friday

Second, we are concerned that the UConn-MDC proposal would have severe environmental effects on the Farmington River based on the proposal to install a 20-mile pipeline.

The law provides that MDC must "supply water to any inhabitants of the towns through which the line of main pipes ...shall pass". Thus, the MDC proposal would expand its public water service to each of the towns between East Hartford and Mansfield. That would bring development pressures of the very sort that the draft State Conservation and Development Policies Plan for 2013-2018 sought to avoid. And this to an area much of which is classified by the present State Plan of Conservation and Development as no-build or low development.

Third, we are concerned that the UConn-MDC proposal is inconsistent with the State Plan of Conservation and Development. The official Council on Environmental Quality emphasized that the Plan of Conservation and Development is not merely a technicality, noting: "The Council is not aware of any provisions in statute that would allow an agency to implement an infrastructure project that is not in conformance with the State Plan."

Fourth, we suggest that UConn's Environmental Impact Evaluation, the "EIE", is not a sufficient basis for decision making.

We know that seven towns could be added to the MDC service area, but the EIE does not begin to try to calculate how much water demand would result.

Even so, the EIE assures us that there is plenty of extra water in the Farmington River, but it does so in reliance on a study of water flows in the West Branch of the Farmington based on flows from 1970 to 1990. Recent experience has shown this data to be obsolete. DEEP staff commented in Simsbury Patch in September 2012 that the water in the Farmington was both low and abnormally warm this past summer, negatively impacting fishing and fish habitat. Businesses such as tubing also suffered declines according to the report.

The National Park Service looked at the EIE, because its review would be required before any federal government permits or other involvement such as funding. The National Park Service comments to UConn basically said that there was not enough clearly stated pertinent information in the EIE to permit them to properly evaluate it.

Finally, the Farmington River is already under stress and the MDC proposal would only exacerbate the situation. The Farmington River is an important resource for fisheries, canoeing, kayaking and tubing as well as an important process for municipal sewage treatment plants. The upper River is currently designated "Wild and Scenic" with the designation currently pending for the lower River.

The UCONN-MDC assertion that there is excess water in the Farmington does not ring true with those of us who know the river. Trout fishing was suspended last year as low water levels and high water temperatures threatened fish survival, even though weather conditions were not unusual enough to be classified as a drought. We have read that the MDC has to make cash payments to the operator of Rainbow Dam because it cannot meet its contractual commitment to deliver water for hydroelectric generation.

Climate change has already taken a toll on the river, and this is not a time to take away more water and thus make it more vulnerable to the additional climate change challenges that we know are coming our way.

The bottom line for the residents of the Farmington Valley is that the MDC proposal is not supported by proper planning, proper scientific and economic analysis and violates state environmental policy. We urge you to pursue preferred alternatives to address the needs of the University of Connecticut. We also request that if further analysis of the MCD option is pursued, the public should be given additional opportunity to comment on any new information.

We look forward to working with you on this important issue.

Sincerely,

Mary A. Glassman

On behalf of:

Brandon Robertson, Avon Town Manager
Kathleen Egan, Farmington Town Manager
Jeffrey Hogan, Chairman, Farmington Town Council
Richard Barlow, Canton First Selectman
Donald Stein, Barkhamsted First Selectman
William Smith, Granby Town Manager
James Hayden, East Granby First Selectman
Thomas McKeon, Colebrook First Selectman
Theodore Shafer, Burlington First Selectman
Dan Jerram, New Hartford First Selectman