



# Changes Ahead for Water Supply Planning

By Elizabeth Gara, CWWA

Always plan ahead. It wasn't raining when Noah built the ark. – Richard C. Cushing

As Noah soon found out, planning ahead ain't monkey business – particularly when you're responsible for meeting needs which are critical to the greater community.

For the water industry, planning has always been important to meeting the public health and safety needs of residents and businesses. For nearly 25 years now, water utilities serving more than 1,000 persons or 250 customers have been required by state law to develop water supply plans that capture current and projected water supply needs for 5, 20 and 50 year planning horizons. The plans must provide information on the utility's currently available water supply, water quality and treatment capacity; examine potential future water supply needs;

and explore how the utility will meet the current and future water supply needs for their customers. Clearly, these plans serve as a valuable tool for the utilities and for state regulators by providing a long-term snapshot of Connecticut's water supplies.

A new law spearheaded by CWWA and the state Department of Public Health (DPH) in 2009 builds on these requirements to address key water supply issues by requiring supply plans to include information about a water company's underground infrastructure replacement program.

"Replacing aging water utility infrastructure is a critical need and responsibility for water companies throughout the country, especially



in areas like the northeast where our older infrastructure tends to be concentrated," said David Radka, Past President of Connecticut Water Works Association.

"We surveyed Connecticut utilities and found that with very few exceptions, infrastructure replacement programs were not as aggressive as they probably needed to be. Rather than dictate any specific replacement schedule, however," explained Radka, "we felt there was much to be gained by simply asking utilities to come to terms with their infrastructure needs through the planning process. We see this as a critical first step in helping utilities start to proactively meet those needs."

## Extending the Timeframe for Filing

Another key provision sought by CWWA is the extension of the timeframe for filing the plans with DPH from every 3 to 5 years to every 6 to 9 years.

“Extending the timeframe for filing makes a lot of sense since the plan is a long-range planning tool based on a 50-year planning window. It will also save utilities and their customers time and money because preparing the plan requires countless hours of staff time as well as an outside consultant at considerable cost to the town,” said Mark Decker of Colchester Water in testimony before the legislature’s Public Health Committee.

According to Lori Mathieu, Public Health Services Manager of the Drinking Water Section (DWS) of DPH, “Under Public Act 09-220, plans are required to be updated every 6 years and are eligible for the longer timeframe of 9 years if the system meets all of its public water system obligations. Plan updates also will be scheduled six or nine years from the actual plan approval date, not submission date.”

In addition, following an approval of a complete Water Supply Plan after the October 1, 2009 effective date of the new law, future updates to that plan should only consist of those elements of the plan that have changed since the previous plan update, unless requested otherwise by the Commissioner.

“These changes will improve the efficiency of the process and reduce costs,” Mathieu said.

## What companies are eligible for the 9 year extension?

In order to be able to file a plan every 9 years rather than every 6 years, water companies will be

required to meet major water supply issues, including:

- Accurate safe yield studies on all sources including 72 hour simultaneous pump tests on all wells
- Consistent and accurate use of terminology
- Sufficient margins of safety
- Sale of excess water permits are obtained, as needed
- No other existing violations or major outstanding issues are identified in the sanitary survey.

## Reduce Costs of Water Supply Plan Preparation

Internally, the department plans on addressing other issues to improve the efficiency of the process. As Steve Messer, Supervising Sanitary Engineer for DWS points out, “We want to reduce the costs associated with the preparation and review of water supply plans by providing streamlined tools, assessments, and hands-on technical assistance through training sessions.”

In addition said Messer, “There was a lot of inconsistency in how plans were developed, the terminology used by water companies and in how certain data were calculated as well as in how our staff reviewed the plans. These issues contributed to a lengthy review process that was frustrating for everyone.”

To address these issues, the department has put together a Technical Advisory Committee of staff and water industry professionals, including several CWWA and CTAWWA members, to define terminologies and equations to be used in calculating data such as available supply, margin of safety and unaccounted for water and develop streamlined tools such as tables to provide for consistent updates to the critical elements of the plan.

The department is also developing a tabulated format for comments on plans to improve clarity and consistency of state responses to water supply plans. And, it plans to conduct pre-water supply plan meetings with water company officials and following each set of review comments to address any issues that may come up and give water companies the opportunity to respond.

“Our goal is make water supply plans a useful, important, everyday tool for water companies,” Messer said.

## Will the Ark Float?

Since the 2008 reorganization of the planning unit, 25 water supply plan reviews have been completed. DWS compiled some interesting statistics on what these plans tell us:

- Only 11 of those 25 public water systems have a sufficient margin of safety for the 5 year planning period.
- Only 4 of those 25 systems have any excess water available to sell that is not currently committed.

This is troubling, given that the state Department of Environmental Protection has proposed streamflow regulations that will negatively impact safe yield and margin of safety in many areas across the state. Clearly, water companies and public officials need to accurately assess the current status of our many public water systems, as well as the impact of any proposed laws and regulations if we are going to meet the short and long-term water supply needs of our citizens and businesses.

Like Noah, our future depends upon it. 💧