

March 7, 2024

Esteemed Chairs Lopes and Gresko,
Members of the Environment Committee:

The Western Connecticut Council of Governments (WestCOG) appreciates the opportunity to comment on Raised Bill 301, *An Act Concerning Energy Efficiency Standards and Grants for Retrofitting Projects*. WestCOG **supports** this bill, which will update Connecticut’s water efficiency standards. Adoption of these standards will address water and sewer capacity limits in the region, which are becoming increasingly severe problems:

- Water supply emergencies in Danbury, Darien, Greenwich, New Canaan, Stamford (2016)
- Voluntary water usage reductions across the region (2022)
- Mandatory conservation measures in six Darien, Greenwich, New Canaan, Newtown, Stamford, and Westport (2023) and in Ridgefield, Weston, and Wilton (from 2024)
- Sewer capacity limiting redevelopment in Branchville/Georgetown and Brookfield

However, **the bill does not go far enough**. Given how infrequently these standards are updated (the last substantial change was in the 1990s), it is essential that Connecticut get it right today. Specifically, the bill should:

- **Adopt California plumbing fixture requirements**, which are the gold standard and are already in effect in New York and Maine. The standards proposed in the bill would move Connecticut from last in water efficiency in New England and New York to second-to last, with zero improvements required for toilets and urinals (which the bill fails to mention).

State	Effective Date	Toilet (gpf)	Urinal (gpf)	Public Faucet (gpm)	Lavatory faucet (gpm)	Kitchen Faucet (gpm)	Shower (gpm)
New York	26-Jun-23	1.28	0.50	0.50	1.20	1.80	1.80
Maine	1-Jan-23	1.28	0.50	0.50	1.20	1.80	1.80
Massachusetts	26-Mar-21	1.28	0.50	0.50	1.50	1.80	2.00
Rhode Island	25-Feb-21	1.28	0.50	0.50	1.50	1.80	2.00
Vermont	1-Jul-21	1.60	0.50	0.50	1.50	1.80	2.00
CT (Bill 301)	1-Jan-26	1.60*	1.00*	0.50	1.50	1.80	2.00
CT (current)	1-Oct-22	1.60	1.00	0.50	2.20	2.20	2.50
New Hampshire	1-Jul-22	1.60	1.00	0.50	2.20	2.20	2.50

* Not addressed by the bill, so carried over from current standards. gpm/f = gallons per minute/flush

- **Require that new sprinklers be pressure-regulated**. Pressure regulation conserves water and saves costs while improving the efficiency and consistency of irrigation. Twelve states (California, Colorado, Hawaii, Maine, Maryland, Massachusetts, New Jersey, New York, Oregon, Rhode Island, Washington, and Vermont) and the District of Columbia already require pressure-regulation of sprinklers.

Given that plumbing fixtures and sprinklers meeting these standards are commonly available at fair prices, including in fixture retailers just across the state line in New York State, there is no excuse for Connecticut to settle for being second worst. WestCOG urges your Committee to enhance the bill to align Connecticut with New York, adopting California plumbing fixture water efficiency and pressure regulated sprinkler standards.

Thank you for your consideration.

A handwritten signature in black ink that reads "Francis Pickering". The signature is written in a cursive, slightly slanted style.

Francis R. Pickering
Executive Director