



STATE OF CONNECTICUT
OFFICE OF POLICY AND MANAGEMENT
Division of Transportation, Conservation, and Development Policy and Planning

May 5, 2017

Eric McPhee
DPH Drinking Water Section
410 Capitol Avenue, MS #12DWS
PO Box 340308
Hartford, CT 06134-0308

Re: Notice of Scoping: Bunker Hill Water Main Extension, Watertown

Dear Eric:

The Office of Policy and Management (OPM) has reviewed the Notice of Scoping for the Bunker Hill Water Main Extension and submits the following comments:

- DPH's scoping notice mentions [DEEP's recent scoping notice for a sewer extension](#) to serve much of the same area where DPH proposes to extend water mains. DPH's scoping notice describes deteriorating water quality in the neighborhood's private wells and says:

This water quality deterioration has been attributed to substandard septic systems installed on small lots with shallow bedrock, poor quality soils and seasonal high ground water as documented by TAHD. The recommended action in the PER is to extend a water main to the project area to provide a safe and adequate drinking water supply and allow the homeowners to properly abandon the on-site private wells.

OPM notes that one agency's project would replace private wells affected by septic systems while the other agency's project would replace septic systems contaminating private wells. DPH's scoping notice mentions the possibility of coordinating the projects, but how have DPH and DEEP analyzed specific impacts and needs to ensure that the projects are not unnecessarily redundant? There are increasing levels of uncertainty regarding future state and federal funding for such projects, so it is important that funding committed at this time focus on the highest priority problems. Beyond ensuring that state funds are focused on solving the greatest needs, it is important to ensure that state-supported new infrastructure does not unnecessarily create a long-term operation and maintenance burden for the town.

- As OPM acknowledged in comments submitted regarding DEEP's project, some of the houses proposed to be served by the new utilities are on lots as small as ~1/2 acre, limiting the options for providing water and wastewater disposal service. DEEP and DPH have noted other site constraints as well. Nevertheless, other properties in the area to be served by this or future phases of the two projects do not appear to be so limited.

State-funded projects must be consistent with the State Plan of Conservation & Development (POCD), which includes the following policy:

Rely upon the capacity of the land, to the extent possible, to provide drinking water and wastewater disposal needs beyond the limits of the existing service area. Support the introduction or expansion of public water and/or sewer services or advanced on-site wastewater treatment systems only when there is a demonstrated environmental, public health, public safety, economic, social, or general welfare concern, and then introduce such services only at a scale which responds to the existing need without serving as an attraction to more extensive development;

In the Post-scoping Notice or EIE that will follow this Scoping Notice, DPH should provide a detailed description of how it determined the appropriate scale of public water service to respond to the existing need without serving as an attraction to more extensive development.

- This project appears to have a relatively low score compared to other potential projects identified in DPH's current Intended Use Plan (IUP):

http://www.ct.gov/dph/lib/dph/drinking_water/pdf/Final_2017_IUP.pdf

If this project is to be funded ahead of other, higher-scoring projects, it would be helpful if a scoping notice such as this could explain how the decision was made to move forward with a project that would appear to be a lower priority according to the current IUP, especially when, like this project, the chosen project appears to serve a small population relative to its cost and is indicated as not being eligible to receive a federal subsidy.

DPH's IUP also includes a lower-scoring Watertown water main replacement project $\frac{3}{4}$ mile from the beginning of the new main. Do the increased water demands resulting from the current or later phases of the project require that the other project also be completed?

Thank you for the opportunity to respond to this Notice of Scoping and please feel free to contact me if you have any questions.

Sincerely:



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