



STATE OF CONNECTICUT

COUNCIL ON ENVIRONMENTAL QUALITY

VIA ELECTRONIC MAIL

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Robin Rittgers
Bureau of Water Protection and Land Reuse
Connecticut Department of Energy and Environmental Protection (DEEP)
79 Elm Street, Hartford, CT 06106-5127
Robin.Rittgers@ct.gov

Re: Notice of Scoping for Town of Coventry Water Pollution Control Facility

Dear Robin Rittgers,

The Council on Environmental Quality (Council) provides the following comments in response to the Scoping Notice for the Coventry Water Pollution Control Facility (WPCF), published in the November 18 edition of the *Environmental Monitor*. **The Council strongly recommends that DEEP conduct an Environmental Impact Evaluation (EIE) of the proposed action for the reasons discussed below.**

The Scoping Notice notes that the Town of Coventry owns and operates a Water Pollution Control Facility (WPCF) at 394 Main Street in Coventry that treats wastewater generated in Coventry. The Scoping Notice also notes that the existing wastewater treatment system has experienced wastewater breakouts on the ground surface and that two options have been identified to address the malfunctioning system:

- 1) upgrade Coventry's existing WPCF at its current location, expand its capacity to approximately 266,000 gallons per day, and alter the groundwater discharge to a direct surface water discharge to the Willimantic River;
- 2) cease on-site treatment and convert Coventry's WPCF to a pump station which would convey its wastewater through a new transmission line to the Windham WPCF.

The Council notes that the following environmental conditions might exist within the project area:

- Portions of the existing site of Coventry's WPCF and/ the identified alternate routes between the WPCF and the proposed connection with the Town of Windham's collection system intersect with DEEP Natural Diversity Database (NDDB) buffer areas.
- The identified alternate routes would intersect with inland wetland soils, Class A surface waters, and prime farmland soils.
- The existing Coventry WPCF and most of the identified routes are not within a flood hazard area; however, a potential pumpstation located at 120 Main Street in Coventry is within the flood zone of the Willimantic River.
- Two of the identified routes, Alternatives 1 and 3b, would require horizontal directional drilling beneath the Willimantic River and a railroad crossing.
- The top layer of soils from the existing rapid infiltration basins (RIB) might contain metals, petroleum-based compounds, pesticides, and/or polychlorinated biphenyls (PCB).

While the Regulations of Connecticut State Agencies (RCSA) Section 22a-1a-7 requires “*consideration of all factors listed in section 22a-1a-3 of the CEPA regulations*”¹, an EIE requires a more detailed and thorough evaluation of the potential “*direct, indirect, and cumulative environmental effects*” of those factors as well as a full and fair discussion of the potential impact of the proposed action on environmental and community resources including, but not limited to, the following:

- *the relationship of the action and its reasonable alternatives to adopted land use plans, policies and controls, including, but not limited to, the state plan of conservation and development, for the affected areas;*
- *each alternative, including, to the extent practicable, whether the alternative avoids, minimizes, or mitigates environmental effects of the action;*
- *any irreversible and irretrievable commitments of resources which would occur should the action be implemented. Such resources shall include those materials devoted to the action and the natural and cultural resources that would be affected as a result of the action;*
- *mitigation measures to the action including limiting the degree or magnitude of the action; rectifying the effects of such action by repairing, rehabilitating or restoring the impacted environment; reducing or eliminating the impact over time by preservation and maintenance operations; and compensating for the impact by replacing or providing substitute resources or environments. Mitigation measures should be developed to a level of detail commensurate with the magnitude of the potential environmental effects;*
- *effects of the action on archeological sites or documented sacred sites; and*
- *short-term and long-term economic, social and environmental costs and benefits of the action, including a comparison of benefits and costs for reasonable alternatives.*

Further, an EIE would provide the public and state agencies another opportunity to provide comments regarding the potential impacts of the proposed action, including all reasonable alternatives, when more information is available. Given the scale of the proposed action, the various alternatives, and potential environmental impacts (both known and unknown), **the Council strongly recommends that DEEP conduct an EIE of the proposed action.**

Thank you for your consideration of the Council’s comments.

Sincerely,



Paul Aresta
Executive Director

¹ Sec. 22a-1a-7(d) - If the sponsoring agency determines it will not prepare an environmental impact evaluation after public scoping.