MEMO

TO: Casey Chartier, Sanitary Engineer Intern, DEEP

FROM: Stewart Chute, Toxicologist, Environmental Health Section

DATE: March 29, 2021

RE: Environmental Impact Evaluation for New Haven's Sewer Overflow Control Plan

Thank you for the opportunity to comment on the Environmental Impact Evaluation (EIE) for the proposed Greater New Haven Water Pollution Control Authority's Combined Sewer Overflow Long-Term Control Plan. As I work with environmental impacts to recreational waters, I would like to see included a discussion of how the separation of stormwater and sewer will improve water quality at swimming beaches.

The EIE does not clearly examine if new pipelines for stormwater and sewer will be constructed when they are separated. This leaves the question of will the existing infrastructure be abandoned in place or if the existing infrastructure will be re-used for stormwater or sewers? If the existing infrastructure is to be re-used, the report does not address how existing infrastructure will be maintained. The Mill River spill in July 2020 was a result of a collapse of a 30-inch diameter sewer pipe. This raises the concern that the existing infrastructure is in need of maintenance and repairs. The maintenance and repair discussion should be included in the EIE.

Again, DPH thanks you for the opportunity to comment. As this EIE goes forward, DPH is willing to work with DEEP to help prioritize these repairs which will assist to address significant adverse events. Please let me know if you need any additional clarification to these comments.

c: Heather Aaron, MPH, LNHA, Deputy Commissioner, DPH
Lori Mathieu, Environmental Health and Drinking Water Branch Chief
Jim Vannoy, MPH, Environmental Health Section Chief
Ryan Tetreault, Supervising Environmental Analyst, Environmental Health Section