1.0 INTRODUCTION

1.1 BACKGROUND

Water supply planning in Storrs and Mansfield has been underway for nearly two decades. The University of Connecticut (University) has prepared four individual water supply plans beginning in 1994. Additionally, the Town of Mansfield prepared a water supply plan in 2002. These water supply plans provided estimates of future water demand in different geographic areas, with the University's plans focusing on the main campus, Depot Campus, and immediately adjacent areas. The Town of Mansfield's plan included more distant areas that could benefit from water supply, such as the Mansfield Four Corners area and residential neighborhoods to the west of the main campus.

The University and Town of Mansfield water supply plans published prior to 2005 each noted that the University's registered water supplies (the Fenton River wells and the Willimantic River wells) were together adequate for the foreseeable future, with over 3.0 million gallons per day (mgd) available per the water diversion registrations on file with the Connecticut Department of Energy & Environmental Protection (CT DEEP), and that future sources of supply would be needed mainly to begin supplying public water service to new areas in Mansfield.

Based on the results of the Long Term Impact Analysis of the University of Connecticut's Fenton River Water Supply Wells on the Habitat of the Fenton River (more commonly known as the Fenton River Study) in 2006, the need for reducing withdrawals from the Fenton River wells during periods of low instream flow was conclusively articulated for the first time. The University's 2007 Water and Wastewater Master Plan recognized that, moving forward, the Fenton River supply would be limited during the summer and fall to much lower withdrawals than the diversion registration allowed for and that additional supply sources would be needed in the future.

Meanwhile, questions were beginning to be raised about the hydrogeologic capability of the Willimantic River Wellfield to supply its registered withdrawal. Environmental groups were interested in having the Willimantic River analyzed in a manner similar to the *Fenton River Study*. These questions led, in part, to the *Report of the Willimantic River Study: An Analysis of the Impact of the University of Connecticut Water Supply Wells on the Fisheries Habitat of the Willimantic River (more commonly known as the Willimantic River Study) that was completed in 2010. The study evaluated potential impacts to fisheries habitat in the Willimantic River due to withdrawals from the Willimantic River Wellfield and evaluated potential additional withdrawals at the wellfield from the standpoint that the timing of withdrawals could potentially be manipulated to reduce impacts to the river.*

The two river studies concluded that the existing wellfields had likely reached their limits for public water supply.

□ The *Fenton River Study* published in 2006 evaluated the impact of withdrawals at the Fenton River Wellfield on the fisheries habitat of the Fenton River and concluded that withdrawals should be reduced or ceased during low streamflow periods. Expansion of the Fenton River



Wellfield to increase the volume of withdrawals from the aquifer has not been pursued in light of the instream flow constraints identified by the *Fenton River Study*.

□ The *Willimantic River Study* published in 2010 concluded that reducing withdrawals from the Willimantic River aquifer during low streamflow periods was necessary to protect fisheries habitat. Additionally, the study found that moving wells further downstream provided limited benefit and that the installation of additional wells at the wellfield would not be prudent in light of the instream flow constraints identified by the study. Expansion of the Willimantic River Wellfield to increase withdrawals from the aquifer could further exacerbate the fisheries habitat impacts during the low streamflow periods identified by the *Willimantic River Study*.

Two parallel efforts brought water supply issues to the forefront in 2010 and 2011: the University's development of its updated individual *Water Supply Plan* (submitted to state agencies in May 2011) and the Town of Mansfield's study of water supply options for redevelopment of the Mansfield Four Corners area. The University's 2011 *Water Supply Plan* identified four areas of future potable water service that were committed by the University: The Storrs Center development, the North Campus Technology Park, Depot Campus redevelopment, and the King Hill Road Planned Business Area. The 2011 *Water Supply Plan* further identified the need for an additional 0.5 mgd to 1.0 mgd of available supply to bolster available water during certain months of the year and boost margins of safety¹ (MOS) above 1.15 over the 50-year planning period. This amount of water was needed in the short/intermediate term to meet MOS requirements during periods of peak demand when Fenton projection is curtailed or ceased.

Meanwhile, the Town of Mansfield's study of water supply options for redevelopment of the Mansfield Four Corners area identified future areas of water need in the town that were not committed to by the University in its 2011 *Water Supply Plan*. Specific to the Mansfield Four Corners area, a total of 0.17 mgd of water demand has been estimated for this area through the 20-year planning period.

The University's 2007 *Water and Wastewater Master Plan*, 2011 *Water Supply Plan*, and the Mansfield Four Corners study report (2011) all included evaluations of interconnections with Windham Water Works (WWW) and The Connecticut Water Company (CWC) to provide an additional increment of water, along with preliminary evaluations of new groundwater supplies along the Willimantic River (downstream of the existing University wellfield) and in the Mansfield Hollow area (near Mansfield Hollow Lake). The three documents included varying degrees of analysis for each alternative but, in general, they all raised questions that would need to be addressed in more detail in order to evaluate and pursue an option for additional supply.

Given the mutual need for water to address potable water demands identified in the 2011 *Water Supply Plan* and the 2011 Mansfield Four Corners study report, the University and the Town of Mansfield began to collaborate to identify a source of water supply that would meet combined future needs. In June 2011, the University and the Town of Mansfield initiated the subject Environmental Impact Evaluation (EIE) under the Connecticut Environmental Policy Act (CEPA)



¹ Margin of Safety is defined as the ratio of available supply over demand. A margin of safety of 1.15 implies that a water system has 15% more water available than demand. This 15% provides a buffer against unforeseen circumstances, such as water main breaks or other emergencies.

to allow for a detailed evaluation of potential interconnection and groundwater supply alternatives. An additional water supply will have the dual benefit of increasing the University's MOS while also providing potable water for use on campus and in the town of Mansfield consistent with the town's Plan of Conservation and Development (POCD) and zoning regulations.

1.2 **PROJECT PURPOSE AND NEED**

In May 2011, the University submitted the latest five-year update of its Water Supply Plan to the Connecticut Department of Public Health (DPH) and other state agencies. The Water Supply Plan analyzed committed future demands over the next 50 years and concluded that the four areas of committed future demands will require approximately 360,000 gallons per day (gpd). The projections in the Water Supply Plan assume that Fenton River Wellfield Well D will be approved for limited use² during seasonally dry periods and that reclaimed wastewater will be available for future nonpotable uses such as cooling, heating, and potentially irrigation of turf grass. The reclaimed water facility is anticipated to be operational by December 2012, and limited use of Well D is pending approval from the CT DEEP.

Even with these efforts to bolster supply and reduce potable water demand, the MOS of the University water supply system during maximum demand months is predicted to drop below the DPH's MOS goal of 1.15. Based on the information presented in Tables 7-17 and 7-18 of the 2011 Water Supply Plan, a minimum of 0.32 mgd of new water supply will be necessary to meet the maximum month³ MOS goal of 1.15 in 2060, and a minimum of 0.73 mgd of new water will be necessary to meet the peak day⁴ MOS goal of 1.15 in 2060. Any currently unforeseen additional demands realized by the University will, in turn, further impact the MOS of the University's water supply system and thereby increase the need for additional water supply.

A water supply expansion or interconnection to supply the Mansfield Four Corners area has long been a goal of the Town of Mansfield. The Mansfield Four Corners area is considered to be one of several "gateways" to Mansfield and the University, but several of the businesses in the area have been shuttered. The decline of this area has been partly attributed to the lack of adequate, clean drinking water and safe sewage disposal. Furthermore, the lack of reliable water supply in the Mansfield Four Corners area has been cited as a significant limitation on redevelopment. Water quality and quantity issues in this area have historically been difficult to address without the comprehensive solution afforded by an extension of water and sewer utilities. The availability of public water supply in this area is believed key to revitalization efforts. A potable water demand of approximately 170,000 gpd is estimated for this area through the end of the 20year planning period.

In 2011, the State of Connecticut passed legislation (Senate Bill No. 1242 - Public Act No. 11-57) authorizing the issuing of bonding for the purpose of the development of the proposed



² Such use of Well D would be in accordance with its diversion registration and the operating procedures presented in the Wellfield Management Plan (2011).

³ While 0.32 mgd will need to be available to maintain a MOS of 1.15, a lesser quantity (0.04 mgd) would be needed for actual consumption.

⁴ While 0.73 mgd will need to be available to maintain a MOS of 1.15, a lesser quantity (0.38 mgd) would be needed for actual consumption.

Technology Park on the University's North Campus. Cognizant of the need for public water service by the University and the Town of Mansfield, this legislation authorizes the University to charge for and supervise on- and off-campus improvements and states that the University shall work in consultation with the Town of Mansfield regarding any on-site or off-site utilities that are financed pursuant to the proposed Technology Park. In particular, this legislation enables the University to work with the Town of Mansfield in regard to extending water and sewer service to Mansfield Four Corners.

In order to enable growth of the University and the surrounding area consistent with the University's master plans and associated environmental analysis and the Town of Mansfield's *Plan of Conservation and Development*, the University and the Town of Mansfield are evaluating alternatives that will identify a viable long-term public water supply source. This additional supply would have the dual benefit of increasing the MOS of the University water supply system while also providing potable water for use on campus, in the Mansfield Four Corners area, and elsewhere in town.

The need for additional water supply is driven by existing and future water demands as follows:

- <u>Need for Sufficient MOS</u> MOS is thoroughly evaluated in the University's *Water Supply Plan* (2011) and in the water demand projections of the *Water and Wastewater Master Plan* (2006). A minimum of 0.32 mgd of new water supply will be necessary to meet the maximum month MOS goal of 1.15 during periods of peak demand and when the Fenton River Wellfield is curtailed or offline. This includes existing system demands plus committed water supply both on and off campus. It also accounts for the reduction of demand that will occur once the reclaimed water facility comes on line. Off-campus committed demands include Storrs Center and King Hill Road Planned Business Area. Of the 0.32 mgd quantity, only 0.04 mgd would be needed for consumption; the remainder would be placed on standby for MOS. A minimum of 0.73 mgd of new water will be necessary to meet the peak day MOS goal of 1.15 in 2060. Of the 0.73 mgd quantity, only 0.38 mgd would be needed for consumption; the remainder for MOS.
- 2. <u>Additional Incremental Demand to Supply the Technology Park</u> The proposed Technology Park on the University's North Campus was allocated a committed water demand of 89,600 gpd in the 2011 *Water Supply Plan*. This figure was revised in May 2011 from prior estimates through a tabulation of potential gross square footage of buildings to be constructed in the Technology Park. At the present time, higher average water demands are being forecast for the Technology Park. Current estimates are approximately 423,500 gpd. With 89,600 gpd already set aside in the 2011 *Water Supply Plan* and analyzed as part of the water needed to maintain future margins of safety, the increment of 333,900 gpd is therefore an additional future water demand. Maximum month demands and peak day demands will be somewhat higher although the timing of peaking factors is likely to be different for each parcel in the Technology Park, depending on the use (i.e., classroom versus year-round research). The analysis on page 6-25 of the 2011 *Water Supply Plan* provides the rationale and justification to support a ratio of 1.33 for peak day planning calculations. This factor is applied to the average day demand of 333,900 gpd to estimate a peak day demand of 444,087 gpd. Applying the desired 15% MOS yields the following demand forecasts:



Condition	Base Demand	Base Demand Plus 15% MOS
Average Day	333,900 gpd	383,985 gpd
Peak Day	444,087 gpd	510,700 gpd

TABLE 1.2-1 Additional Incremental Technology Park Demand

3. <u>Future Town of Mansfield Demand</u> – In addition to the previously committed water service in the Town of Mansfield, the town has identified previously uncommitted demands associated with the Mansfield Four Corners development (170,000 gpd), a planned elderly and assisted living facility (30,000 gpd), and a number of residential development areas as identified in Tables 2-9, 2-10, and 2-11 of the *Water and Wastewater Master Plan* (totaling 253,500), for a total average day demand of 453,500 gpd. Provision of public water to these areas is consistent with Mansfield's *Plan of Conservation and Development*. Similar to the Technology Park, factors are applied to obtain peak day demand as well as a 15% MOS as follows:

TABLE 1.2-2 Additional Demand Within the Town of Mansfield

Condition	Base Demand	Base Demand Plus 15% MOS
Average Day	453,500 gpd	521,525 gpd
Peak Day	603,155 gpd	693,628 gpd

In total, the following additional water supply is needed to meet peak day demands in the 50-year planning horizon (2060) with a 15% MOS:

TABLE 1.2-3Incremental Water Supply Demand in 2060

Need	Average Day Demand With 15% MOS	Peak Day Demand With 15% MOS
Committed Water Supply Demand	*320,000 gpd	730,000 gpd
Additional Incremental Technology Park Demand	383,985 gpd	510,700 gpd
Additional Town of Mansfield Demand	521,525 gpd	693,628 gpd
TOTALS:	1,225,510 gpd	1,934,328 gpd

*Due to the manner in which the demand was computed in the University's 2011 *Water Supply Plan*, maximum month average day demand is used in this table as a proxy for average day demand.

The above numbers are consistent with the University's *Water Supply Plan* and the *Water and Wastewater Master Plan*, both of which have been vetted by the public, Town of Mansfield officials, and state regulatory agencies.

4. <u>Additional Future University Demand</u> – The water supply planning period extends to the year 2060. It is likely that additional on-campus demands will materialize in that timeframe for uses that are as-of-yet undefined. Potential demand generators include the following:



- Increased student population, with associated housing needs.
- Expanded student recreational and/or athletic facilities, potentially including practice facilities, indoor recreational facilities, recreational fields (i.e. flag football, recreational soccer, rugby, baseball, and softball), athletic fields (i.e. football, soccer), and ice sports.
- Additional classroom space, student laboratory space, and faculty offices.
- Additional research space.

The extent to which the above demands may materialize is unknown at this time, as is any associated timing. As such, a specific value cannot be ascribed to the water demand such uses might require. However, some measure of growth is likely. As such, alternatives will be evaluated for their ability to expand to accommodate additional future potential on-campus growth.

Each of the alternatives will be measured against the ability to meet the project need.

1.3 Description of the Proposed Action

The proposed action is the extension of water to Mansfield and Storrs to augment the University's water supply system to serve current and future needs through the 50-year planning horizon (2060). This action involves extending water supply transmission piping and connecting to a new source or sources of supply.

1.4 RELATIONSHIP TO OTHER PROJECTS AND PLANNING DOCUMENTS

Numerous planning documents related to the proposed action have been evaluated in the context of this EIE, including the following:

The University of Connecticut North Campus Technology Park Final Environmental Impact Statement

The University has been proposing to extend North Hillside Road and develop a research and technology park in the North Campus area since the 1970s. The document entitled *Final Environmental Impact Statement – North Hillside Road Extension* (FEIS) was released in October 2011 and approved in 2012. This document, prepared under the oversight of the Federal Highway Administration, the Connecticut Department of Transportation, and the University of Connecticut, was the culmination of research and planning activities dating back to the mid-1990s. The proposed project will construct a 3,400 foot long, 32 foot wide two-lane roadway from the current terminus of North Hillside Road to Route 44. The extension will facilitate the development of the proposed Technology Park in this area of North Campus as well as provide an alternative entrance to the University.

The subject EIE is relevant to the Technology Park project in that more than 25% of the new water demand to be satisfied is associated with the Technology Park. Many of the alternatives and scenarios evaluated in the subject document propose the installation of a water main in North Hillside Road Extension. The FEIS noted that the construction of the new roadway would include the installation of utilities such as potable water, nonpotable reclaimed water, sanitary



sewer, storm drainage, telecommunications, primary electrical, natural gas, street lighting, and emergency phones. Construction of the roadway and associated water mains is vital to the eventual development of the Technology Park as development of individual water supply wells for the Technology Park buildings is believed to be neither prudent nor practical.

The Town of Mansfield Water Supply Plan

Although the Town of Mansfield does not currently operate a water system, the town developed its *Water Supply Plan* in 2002 for the purpose of evaluating drinking water supply needs in Mansfield, particularly in those areas not served by the University. The information generated in that document has been referenced and utilized in subsequent planning documents. It notes that the majority of the town is served by small water systems that often have chronic water quality or quantity issues. These systems are located in northern Mansfield in areas proximate to the University's Main and Depot campuses. The document also identified as potential sources of water supply two of the interconnections and several of the potential wellfields evaluated in the subject EIE.

The Town of Mansfield's 2002 *Water Supply Plan* summarized projected new water demands, including developable land as well as small public water systems that were considered candidates for an expanded University or municipal water supply. The discussion was categorized into *Existing and/or Committed UConn Water Service* and *Areas Not Served by UConn Water System*.

The existing and/or committed University service areas in the 2002 Water Supply Plan include:

- The North Campus area
- The Storrs Center project area
- Additional University housing
- Holinko Apartments
- North Eagleville Road/King Hill Road planned business area
- The Depot Campus

Outlying areas of potential water demand that the University did not commit to serving with its potable water system included residential areas, existing community water systems, and potentially developable land that are proximal to the University system.

Town of Mansfield Plan of Conservation and Development

The Town of Mansfield adopted its most recent *Plan of Conservation and Development* in 2006. The policies and programs contained therein were reviewed to determine whether the potential sources of water supply would be consistent with the plan. The *Plan of Conservation and Development* is relatively specific and provides significantly more commentary and guidance for water system expansion and usage as compared to many municipal plans. It calls for encouraging "*appropriately located higher-density development by expanding existing sewer and public water services where appropriate*" but stresses the need for environmentally appropriate limitations to water supply. To that end, the plan recommends "working with the University of Connecticut, the Town of Windham, and State officials to plan, fund, and construct appropriate expansions of existing sewer and water systems."



The Four Corners area is specifically identified in Mansfield's *Plan of Conservation and Development* as a redevelopment area. Policy Goal #1, Objective "a" of the POCD calls on the town to "support initiatives to document surface and groundwater quality and public health issues in the Four Corners area and to seek State and Federal funding to extend public sewer and water services to this area." It further notes that this effort is of "immediate importance" and must be coordinated with the University and other pertinent agencies. Objective "c" of Policy Goal #1 notes that the Four Corners area is a priority mixed-use development area.

The University of Connecticut Water Supply Plan

For certain regulated water utilities in Connecticut, water supply plans must be completed in accordance with Section 25-32d of the Connecticut General Statutes (CGS) and Section 25-32d of the Regulations of Connecticut State Agencies (RCSA), as may be updated from time to time. These regulations and the supporting statutes recognize that planning is a critical management activity of all water utilities. The principal goals of water system planning as defined by the DPH are to: (1) ensure an adequate quantity of pure drinking water now and in the future; (2) ensure orderly growth of the system; and (3) make efficient use of available resources.

The University is statutorily defined as a constituent unit of higher education pursuant to CGS Chapters 185 and 185b and not a "water company" as set forth in CGS Section 25-32a. Nevertheless, the University operates a public water system and views the *Water Supply Plan* as integral to planning for a safe and adequate water supply system for the foreseeable future. The University completed its most recent plan update in May 2011 and submitted it to DPH for approval. That document has been reviewed in light of the proposed regional water supply interconnection relative to its consistency with policies, programs, and planned projects of the University.

The University has a variety of existing and future demands that it has committed to serving, including the North Campus Technology Park, Storrs Center, the North Eagleville Road/King Hill Road planned business area, and the Depot Campus. As demonstrated in the most recent *Water Supply Plan*, the University's ability to serve those demands while maintaining a 15% MOS is adversely affected during higher demand months due to restrictions in available water. The *Water Supply Plan* outlines several potential alternatives to increase MOS in the short term, including limited utilization of Fenton Well D and the construction of a reclaimed water facility. Intermediate and long-term demands will need to be met through interconnections or new sources of supply that can provide 0.32 mgd to 0.72 mgd to the University in order to maintain a MOS of 1.15 through the year 2060; a value of 0.5 mgd for new water was used in the 2011 *Water Supply Plan* for planning purposes. This need, in conjunction with potential water demands identified in the town of Mansfield, led in part to the decision to undertake the subject EIE.

As noted in the University's 2011 *Water Supply Plan*, several of the committed demand areas presented in the 2002 Town of Mansfield *Water Supply Plan* have been incorporated into the University's service area over the past 10 years. Note the following:

 Many new University housing projects have been completed, including Hilltop Apartments, Charter Oak Apartments, and Charter Oak Suites. New University housing formerly proposed to be located at or west of Northwood Apartments is no longer proposed.



- Holinko Apartments is now serviced by the University water system.
- The Storrs Center project is currently under construction.
- The FEIS has been approved for the extension of North Hillside Road in association with the new Technology Park. Implementation of this project is expected to occur within the next five years.
- Redevelopment or new development on some sections of the Depot Campus have occurred and will continue during the next five years.
- While the North Eagleville Road/King Hill Road planned business area currently has no redevelopment plan, this could occur at any time.

The Connecticut Water Company Water Supply Plan

The CWC prepared its most recent water supply plan for the Northern Operations region in 2006. This document has been reviewed in light of a regional water supply interconnection relative to its consistency with policies, programs, and planned projects of CWC. In Sections 2.3 (Interconnections), 4.3 (Future Service Areas), and 5.2 (System Improvements), CWC's water supply plan notes the need for an interconnection between its Western System in Tolland and the University of Connecticut system "*within the next five years*" to help the University meet peak demands, provide critical supply redundancy, and provide potable water to additional areas of Mansfield. In Sections 2.3 (Interconnections) and 4.3 (Future Service Areas), the water supply plan identifies the need to permanently address chronic supply issues in northwestern Mansfield.

Coincident with the University's individual water supply plan submittal in May 2011, DPH requested additional information from CWC to evaluate future margins of safety in the Northern Region's Western System. In October 2011, CWC completed an update to its *Northern Operations Western System Water Supply Plan* and submitted it to DPH for approval. Water supply projections were updated through October 2011.

The Metropolitan District Commission Water Supply Plan

The Metropolitan District Commission (MDC) prepared its most recent water supply plan in 2008. This document has been reviewed in light of a regional water supply interconnection relative to its consistency with policies, programs, and planned projects of the MDC. Although the plan includes a detailed discussion about interconnections in Section III-C, potential future service to the University and Mansfield is not included or discussed in the plan. Instead, Section VIII-A states that "*The District does not at this time anticipate extension of the water distribution system outside this [exclusive service area] boundary. The District would work with the [Upper Connecticut River] Water Utility Coordinating Committee in determining additional future services areas that it might advantageously serve.*"



The Windham Water Works Water Supply Plan

WWW completed its most recent *Water Supply Plan* update and submitted it to DPH for approval in February 2009. Comments were received from DPH in June 2011, and the plan was revised in September 2011. This document and DPH's comments have been reviewed in light of a regional water supply interconnection relative to its consistency with policies, programs, and planned projects of WWW.

The WWW *Water Supply Plan* states that an interconnection with the University is a possibility. It further notes that if any water were made available for use by the University it would be necessary to increase the WWW treatment plant capacity and amend its diversion permit to allow a withdrawal that maintains a 15% MOS under average day, maximum month, and peak day conditions.

DPH commented in June 2011 that, based on the information in the *Water Supply Plan*, WWW appears to be able to supply an additional 1.0 mgd and still maintain the 15% MOS except on peak days. Treatment plant upgrades would therefore be necessary to support peak day demands and, as such, could potentially be performed over a longer period of time. However, the comments offered by DPH were written prior to WWW's plan revision, which was subsequently submitted and is currently under review.

Conservation and Development Policies Plan for Connecticut

The *Conservation and Development Policies Plan for Connecticut (2005–2010)* (the State Plan) provides the policy and planning framework for administrative and programmatic actions and capital and operational investment decisions of state government. The objective of the plan is to guide a balanced response to the current and future human, economic, and environmental needs of the state. The plan has been consulted extensively to evaluate the consistency of the proposed sources of water supply with the goals and policies relative to land use, growth management, sensitive environmental resources, resource management, public investment, the economy, and integrated planning. The pertinent guidelines and policies set forth in the plan are presented throughout the subject EIE.

Capitol Region Plan of Conservation and Development

The Capitol Region Council of Governments (CRCOG) regional planning organization adopted its most recent Plan of Conservation and Development in 2009. This land use plan is pertinent to activities in the town of Tolland. The policies and programs were reviewed to ensure that a potential water supply interconnection would be in accordance with CRCOG's conservation and development plan. Chapter 8 of the document discusses public sewer and water service. The plan calls for ensuring an adequate and high quality water supply primarily through partnership with existing service providers and by supporting efforts to protect high-yield aquifer areas. The plan suggests that member towns "*use existing water and sewer infrastructure to guide future growth*" and to "*work with local officials and utility providers to encourage the development of an infrastructure system that meets desired local and regional growth patterns*."



Windham Region Land Use Plan

The Windham Region Council of Governments (WinCOG) regional planning organization adopted its most recent land use plan in 2010. The plan is pertinent to activities in the towns of Coventry and Mansfield. The policies and programs were reviewed to ensure that a potential water supply interconnection would be consistent with the plan. In addition, WinCOG provided a comment letter regarding the University's most recent *Water Supply Plan* that addresses the potential water supply alternatives outlined in this EIE. In particular, WinCOG noted that:

- The proposal to seek additional water to support the growth of Storrs (including the University of Connecticut Main Campus, Downtown Storrs, and Mansfield Four Corners) is consistent with the goals of the Windham Region Land Use Plan as the area is demarcated as a Regional Center.
- Development should be sensitive to water resources and public water supply recharge areas particularly as it relates to impacts to the Fenton River and Willimantic River systems.
- The provision of public water supply to areas not demarcated as a Regional Center may not be consistent with the goals of the Windham Land Use Plan. Specifically, the plan does not support the provision of water for additional development activities along roadway corridors that are designated as Rural Conservation Areas or Preservation Areas.

