Keith Ainsworth
Acting Chair

Alicea Charamut

David Kalafa

Kip Kolesinskas

Matthew Reiser

Charles Vidich

─────────

Peter Hearn
Executive Director

November 19, 2021

Stela Marusin
Sanitary Engineer III
Department of Energy and Environmental Protection
79 Elm Street, Hartford, CT 06106

RE: Environmental Impact Evaluation (EIE) for Naugatuck Valley Regional Wastewater Study

Dear Ms. Marusin:

The Council on Environmental Quality ("Council") reviewed the EIE for the Naugatuck Valley Regional Wastewater Study and has questions about the project's analysis and a recommendation about its design.

The EIE referenced the U.S. Fish & Wildlife Service (USFWS) Information, Planning and Consultation database to make its determination that there are "no known endangered species will be impacted by project construction activities". The Council is of the belief that because the EIE was funded through the Regional Performance Incentive Program of the Office of Policy and Management (OPM), a review of the state's Natural Diversity Database (NDDB) was also required. Will that source be referenced prior to initiation of construction activities?

Stormwater flows over the projected 20-year horizon of the planning period are expected to increase. These projected periods of extreme rainfall events will have to be handled by the new sewer lines and the Ansonia facility. Has the design of the conveyance lines and the plant capacity at Ansonia been determined to be adequate to handle these increased precipitation events without triggering bypass events in the system? Additionally, is the capacity of the new lines and facility sufficient to handle eventual infiltration and inflow during future storms?

The Council recommends that whenever capital improvements are to be made at the Ansonia plant, its resilience to increasing storms and flooding are utmost considerations in its design.

Thank you for your anticipated answers to these questions.

Sincerely,

Peter Hearn,
Executive Director