

COUNCIL ON ENVIRONMENTAL QUALITY



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VIA ELECTRONIC MAIL

July 22, 2026

Eric McPhee
Bureau of Water Protection and Land Reuse
Department of Public Health, Planning & Drinking Water State Revolving Fund Section
410 Capitol Avenue, MS #12DWS, PO Box 340308
Hartford, CT 06134-0308
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Re: Notice of Scoping for The Metropolitan District Commission Transmission Main Project

Dear Eric McPhee,

The Council on Environmental Quality (Council) provides the following comments in response to the Notice of Scoping for The Metropolitan District Commission Transmission Main Project published in the July 21, 2026 edition of the *Environmental Monitor*. The Council recommends that the Department of Public Health (DPH) complete an Environmental Impact Evaluation (EIE) for the proposed action for the reasons discussed below.

The Notice of Scoping notes that The Metropolitan District Commission (MDC) public water system is proposing to install a new 30-inch diameter water transmission main from Windsor through portions of Hartford, beneath the Connecticut River and Podunk River, through South Windsor to the intersection of Ellington Road and King Street in East Hartford. In addition, the Scoping Notice identifies two (2) construction alternatives under consideration for the Podunk River crossing and adjacent project segments. Both alternatives would include a trenchless crossing beneath the Connecticut River.

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

- Portions of the proposed project intersect with Department of Energy and Environmental Protection (DEEP) Natural Diversity Database (NDDDB) buffer areas, a fisheries management area, critical habitat, and Wildlife Action Plan Conservation Opportunity Areas.
- The identified routes could intersect with inland wetland soils, prime farmland, and farmland of statewide importance, especially on the east side of the Connecticut River.
- The identified routes would intersect with a flood hazard area.
- Both routes would require horizontal directional drilling or Direct Pipe technology beneath the Connecticut River. Under Alternative B, the Podunk River crossing could also be constructed using either open-cut trenching or a short-length trenchless method resulting in approximately 1,050 lineal feet of additional open-cut trenching on the east side of the Connecticut River.
- Given the nature of previous development, especially along the west side of the Connecticut River, the existing soils might contain metals, petroleum-based compounds, pesticides, and/or other pollutants.

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”, 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, consideration of two alternatives, and potential environmental impacts (both known and unknown), the Council recommends that DPH complete an EIE for the proposed action.

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

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Aresta". The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul Aresta
Executive Director