

May 22, 2025

Mr. Anthony Poon  
Department of Energy & Environmental Protection  
Bureau of Water Protection & Land Reuse  
79 Elm St  
Hartford, CT 06106

Re: 4/22/2025 Notice of Scoping for Franklin Sewer and Water Main Extension

Dear Anthony:

The Office of Policy and Management (OPM) has reviewed this scoping notice and recognizes that the proposed sewer extension is a component of a considerably larger extension proposal that underwent a CT Environmental Policies Act (CEPA) review in 2017-18. The scale of that project was significantly reduced after OPM rejected the initial Environmental Impact Evaluation (EIE) and Record of Decision (ROD) prepared by DEEP. The area of the previous proposal is shown in various colors on the following [map](#):



Following the initial rejection, OPM staff met with the town and others involved with the project, and an agreement was subsequently reached for OPM to approve a revised EIE and ROD, subject to certain conditions. Specifically, the project would be reduced to limit the extension to the green-shaded area on the above map and, furthermore, a regional wastewater plan would be completed prior to any further sewer expansions and DEEP would collaborate with Franklin to formally amend its water pollution control plan to designate the large, northernmost parcel in the orange area to be a sewer avoidance area.

With that background, OPM submits the following comments regarding the 4/22/2025 scoping notice:

- The Murphy Rd sewer extension portion of the project would serve the area shown in purple on the above map. Neither the Southeastern CT Council of Government's (SCCOG's) 2019 [Regional Wastewater Management Plan](#) nor the Sewer and Water

Service map in Franklin's 2023 [Plan of Conservation and Development](#) (POCD) appears to propose that extension.

- OPM's understanding at the time it approved the EIE/ROD in 2018 was that Franklin's Water Pollution Control Plan would be amended to designate Parcel #118, the northernmost and largest of the parcels shown in orange on the above map, as a sewer avoidance area. However, Franklin's 2023 POCD does not show the expected avoidance area. Rather, Franklin has designated a floating Planned Recreation District Development zone in that area. The 2019 regional wastewater plan appears to propose it be served by a future sewer extension.
- During discussions that led to OPM's approval of the revised 2018 EIE/ROD, OPM staff indicated that future state assistance to extend the sewer service area beyond what was authorized at that time would require a new CEPA process, preferably as part of a broader, multi-town evaluation. Due to this project's apparent inconsistency with the local and regional plans prepared since that time, and due to changing regional needs and opportunities for employment and housing, DEEP should consider the need to conduct or update such a regional wastewater evaluation.

The [State Conservation and Development Policies Plan](#) (C&D Plan), which guides state agency actions and activities related to land use, includes a target under the Connected and Inclusive Communities vision for state agencies to *"balance the expansion of transportation, sewer, and water infrastructure with state, regional, and local needs, conservation priorities, climate considerations, and long-term fiscal responsibility."* OPM is concerned about expanding public obligations for the costly maintenance of infrastructure that may not address the most critical needs of the town or region.

Thank you for the opportunity to respond to this scoping notice and please feel free to contact me if you have any questions.

Sincerely:



Bruce Wittchen  
Office of Policy & Management  
450 Capitol Ave, MS# 54ORG, Hartford, CT 06106  
(860) 418-6323, [bruce.wittchen@ct.gov](mailto:bruce.wittchen@ct.gov)