

Bozrah Sanitary Sewer Extension Project

- [Notice of Scoping posted on the Environmental Monitor on November 8th, 2022](#)
- [Notice of Time Extension for Post-Scoping Notice posted on the Environmental Monitor on May 16th, 2023](#)

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September 23, 2022

Town of Bozrah
1 River Road
Bozrah, CT 06334
Attn: Bill Ballinger, Selectman
bill@ballinger225.com

Re: Draft Environmental Impact Evaluation Bozrah
Sanitary Sewer Extension Project, dated May, 2022

Dear Selectman Ballinger,

The Department has received and is completing its review of the above referenced document. Technical comments will be sent under separate cover by September 30, 2022. In the meantime, Department staff offer the following information related to the environmental review process required for all projects funded by the state.

In accordance with the CT Environmental Policy Act ("CEPA") requirements, a 30-day scoping notice of the project must be issued and posted on the [CT Council of Environmental Quality's website](#) by the Department to officially start the environmental screening process for this project. This initial scoping notice may result in additional comments produced by members of the public, interested parties, or stakeholders. At the conclusion of the scoping notice period, the draft EIE must be revised to address any comments submitted during the scoping notice period in addition to addressing the comments provided by DEEP. Subsequently, the EIE will be finalized, prior to its publication.

DEEP understands the importance of this sewer extension project for economic development purposes and to address areas with substandard septic systems and stands ready to work collaboratively with the town to mitigate any environmental impacts. If you have any questions regarding this project, please contact me at Anthony.poon@ct.gov.

Sincerely,

A handwritten signature in cursive script that reads "Anthony Poon".

Anthony Poon, Sanitary Engineer I
DEEP, Municipal Water Pollution Control Section

CC: Glenn Pianka, Town of Bozrah
Jeremy Tarasevich, Town of Bozrah
Diana Santo, Town of Bozrah
Michael O'Connor, Town of Bozrah
Jim Ericson, Lenard Engineering Inc.
Nisha Patel, CT DEEP
Julie Wilson, CT DEEP

Carlos Esguerra, CT DEEP

October 5, 2022

Town of Bozrah
1 River Road
Bozrah, CT 06334
Attn: Bill Ballinger, Selectman
bill@ballinger225.com

Re: Draft Environmental Impact Evaluation Bozrah
Sanitary Sewer Extension Project, dated May, 2022

Dear Selectman Ballinger,

Upon completion of the technical review of the above referenced document, I have the following comments/questions. Please note that additional public comments may be generated once the CEPA screening process is initiated on the environmental monitor website, as noted on the Department's correspondence dated September 23, 2022.

General comments:

The proposed sanitary sewer extensions may have a positive environmental impact in helping to eliminate substandard septic systems in the proposed project area however, the proposed sewer connection may exacerbate wet weather flow conditions in Norwich which is a Combined Sewer Overflow ("CSO") community. Even though the proposed connection will take place within a section of Norwich where the sanitary and storm conveyance systems are separated, the net effect on Norwich's collection system capacity would be detrimental. The potential positive environmental benefits from this sewer extension project could be offset by the resulting increase in CSOs in Norwich if sufficient mitigative measures are not utilized.

Bozrah has identified in the Environmental Impact Evaluation ("EIE") preliminary mitigative measures to minimize some of the concerns related to capacity issues in Norwich. However, it is unclear what mitigative actions will be taken to ensure Norwich Water Pollution Control Facility ("WPCF") has the capacity to function adequately during wet weather events and minimize the potential of additional flows from Bozrah exacerbating CSO discharges to Norwich's downstream system. The EIE should be revised to identify Norwich is a CSO community, and identify specific mitigative measures to be taken to minimize wet-weather impacts to Norwich's system.

The EIE should clarify whether the proposed sewer system will be entirely new or if preexisting sewer lines in Bozrah are to be connected. If the proposed sewer lines are connected to preexisting sewer systems, infiltration and inflow ("I/I") preventive measures should be identified and addressed in the EIE. With a new sewer system, preventative measures should be taken to prevent inflow from entering the sewer system. DEEP strongly suggests that the project owner considers the use of low pressure sewers ("LPS") to help minimize long term adverse effects

in Norwich's combined system. As you may know, LPS are less vulnerable to I/I impacts and can help control flow increases during wet weather conditions.

Additional questions on the draft EIE document:

1. Section 1 (Introduction): Aside from STEAP grant and special grant-in-aid monies, what other funding is the project receiving?
2. What is the status of the IMAs between the town of Bozrah, Franklin, and Norwich?
3. The EIE states the following in Section 3.E. "Selected Wastewater Alternative": "*Construction of the new sanitary sewer system extension that connects to the NPU system and discharges to the Norwich WPCF will provide a reliable solution for long-term wastewater management.*" Considering the significant concern about Norwich being a CSO community, the EIE should document in detail the existing issues in the project area related to substandard septic systems. Please coordinate with the local public health office to obtain this documentation and update the EIE appropriately.
4. Section 7.1.1 (Air Quality): Describe measures to control dust during project construction.
5. Section 7.1.3 (Water Quantity/Quality): Are there any I/I issues in Franklin? If so, please provide a description of the problem and how the problem is being addressed.
6. Section 7.1.4 (Floodplains): Please document in the EIE that the Bozrah collection system and pump station design will meet New England Interstate Water Pollution Control Commission (NEIWPCC)-TR-16 requirements, including flood protection measures (if applicable).
7. Section 7.1.5 (Traffic): Even though the exact amount of traffic growth cannot be anticipated at this time, the proposed project can be expected to have an impact on traffic patterns within the proposed sewer service area. With this in mind, what are the anticipated direct and indirect traffic impacts within the project area and what are some of the mitigative measures that will be put in place to address the direct and indirect impacts?
8. Section 7.1.8 (Farmland): Will the sewer extension project expect to serve any undeveloped lots classified as prime farmland?
9. Section 7.1.9 (Cultural and Recreational Resources): When Camp Odetah connects to the sewer extension, what are the population growth projections for this camp compared to current levels?
10. Section 7.1.10 (Threatened and Endangered Species): What is the plan of action if the construction is not done by November 1st due to the Wood turtles going into hibernation from November 1st to March 31st.
11. Section 8.2: The [state plan of C&D](#) has been updated. The current version is 2018-2023. Please update the EIE accordingly.
12. Section 8.2: Please be aware that sewer extensions impacting Balanced Funding Areas (BPFAs) need to be reviewed and assessed in relation the Growth Management Principles (GMPs) included in the current State plan of C&D. For this task, DEEP suggests that you coordinate with Bozrah's planning and zoning officer to document how the project will meet the goals and objectives of the GMP's included in the current state plan of C&D. The planning and zoning officer should document conformance with only the most relevant and applicable GMPs described in the State plan. Please update the EIE accordingly.

13. Section 7.3.8 (Farmland): Figure 5 must be updated to show the properties expected to be connected to the proposed sewer line (SSA map). Any vacant properties located in prime farmland and which are proposed to be connected to the sanitary sewer system will need to be reviewed by the Department of Agriculture for consistency with their policies.
14. Section 9.2 (Socioeconomic and Environmental Justice): In this section, it states that some of the sewer “could” extend into residential area. Please comment if it will or will not extend to residential areas.
15. Section 8.2 states: “Fig. 8 shows that the proposed sanitary sewer will be located within the priority and balanced funding areas and **will not impact undeveloped conservation areas.**” Section 9.2 states: “Fig. 8 shows that the proposed and future sanitary sewer areas will mainly be located within the priority and balanced funding areas. **It appears that some of the project area may encroach on conservation areas.**” Please reconcile these contradicting statements. A plan of action should be made if project areas encroach on conservation areas.

If you have any questions regarding this project or wish to meet to discuss this correspondence, please contact me at Anthony.poon@ct.gov.

Sincerely,

Anthony Poon

Anthony Poon, Sanitary Engineer I
Bureau of Water Protection and Land Reuse
Water Planning and Management Division
Municipal Facilities Section

cc (via email):

Glenn Pianka, Town of Bozrah
Jeremy Tarasevich, Town of Bozrah
Diana Santo, Town of Bozrah
Michael O'Connor, Town of Bozrah
Jim Ericson, Lenard Engineering Inc.
Nisha Patel, CT DEEP
Ivonne Hall, CT DEEP
Julie Wilson, CT DEEP
Carlos Esguerra, CT DEEP



STATE OF CONNECTICUT

OFFICE OF POLICY AND MANAGEMENT

Intergovernmental Policy & Planning Division

December 8, 2022

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

Re: Notice of Scoping for Bozrah Sanitary Sewer Extension

Dear Mr. Poon –

The Office of Policy and Management (OPM) has reviewed the Notice of Scoping for the proposed Bozrah sanitary sewer extension and submits the following comments:

1. The [scoping notice map](#) shows what is labeled “Proposed Sewer Extension” plus a “Segment 4A” extending to the southwest on Bozrah St. Extension and “Segment 4B” extending northeast on Fitchville Rd. The scoping notice does not mention Bozrah St Extension being sewered. The environmental impact evaluation (EIE) should explain whether those segments are part of the current project or are intended to be future extensions. The map, furthermore, shows the proposed Bozrah extension passing properties in Franklin that were excluded from the Franklin system that was subject of a previous EIE. It is assumed that those properties will not have access to the Bozrah extension, but the EIE should clarify this.
2. Pg. 66 of the 2019 Southeastern CT Council of Governments (SCCOG) Regional Wastewater Management Plan mentions a desire for further extension from the area described in the scoping notice (Fitchville) to the Gilman section of Bozrah and potentially beyond there to Lebanon:

The Gilman area is also being promoted as appropriate for higher density development. If connection to Gilman (approximately 15,500 feet of new mains from Fitchville) is ultimately pursued, it would provide the Town of Lebanon the option to consider development of sewers along Norwich Turnpike in southern Lebanon (Section 4.2.9).

http://seccog.org/wp-content/uploads/2020/08/SCCOG_RWMP_final_adopted_071719.pdf

Although mentioned in the regional wastewater plan, those additional extension are not mentioned in the scoping notice and apparently are beyond the scope of the currently proposed project. If the piping from Fitchville to the Norwich system would have the capacity to also convey additional flows from those additional areas, the EIE should also consider those areas. The action addressed by a CEPA review is defined as being “an individual activity or a sequence of planned activities”.

3. A discussion of intra-municipal agreements and potential alternatives on pg. 26 of the regional wastewater plan says “...Norwich, Bozrah, Franklin, Sprague, and Preston are considering a common multi-town agreement at the time of this writing.” An EIE for the Bozrah extension should provide the relevant details of that agreement.

4. The proposed sewer extension to Fitchville appears to be an opportunity to support Bozrah's 2022 Affordable Housing Plan, which says this about the area to be served by the proposed sewer extension:

Fitchville provides the greatest opportunity for new multi-family or two-family housing, as well as housing for seniors. Fitchville is the civic center of Bozrah, it contains Town Hall, the school, a general store, the Post Office, and a diversity of housing types. Many of the existing mill housing duplexes are naturally affordable.

<https://www.townofbozrah.org/DocumentCenter/View/154/Bozrah-Affordable-Housing-Plan-AHP-Final-Adopted-April-14-2022-PDF>

Given the noted housing opportunities, Bozrah's sewer service area planning process should consider the affordable housing plan's action plan which among other things, includes the following:

Proactively plan for sewer expansion that is expected in the medium- and long-term. Assess how zoning may change in an area like Fitchville if sewer is extended, and the types of infill development, including mixed-use and multi-family options that would be possible. It is important that the Town, primarily through the Planning & Zoning Commission articulate its goals for growth and adapt zoning to changing conditions. The 2025 POCD would be an opportune time to begin this planning.

If planning for sewer expansion will precede the town's anticipated 2025 POCD update, the proactive planning described in the affordable housing plan's action plan should not wait for the town POCD to be updated. Sewer service area planning can consider the potential for zoning changes, infill development, new mixed-use & multi-family options, and other potentially relevant options.

5. Norwich, the proposed destination for wastewater generated in Bozrah, is one of the state's municipalities having [combined sewer overflows](#) (CSOs). Bozrah's flow to the Norwich system will be relatively small but would apparently result in the discharge of an amount of combined sewage and storm water equivalent to Bozrah's flow being discharged without treatment to Norwich's rivers some number of days each year. The EIE should consider that potential impact and consider if the Bozrah WPCA should be expected to adopt industry best practices to minimize infiltration and inflow to the town's system that could exacerbate that problem.
6. Policy 1.6 of the state Plan of Conservation & Development (state POCD) says:

Perform a life-cycle cost analysis to identify potential cost burdens beyond the initial capital investment for any proposed action involving the expansion of infrastructure beyond the current limits of the existing or planned service area for the particular form(s) of infrastructure, except when necessary to address immediate public health or safety concerns;

<https://portal.ct.gov/-/media/OPM/IGPP/ORG/cdplan/20190214--Formatted-Document--20182023-Revised-State-CD-Plan.pdf>

The state POCD also notes that “Repairs and upgrades to the state’s aging, and sometimes underutilized, infrastructure represent a significant ongoing cost to taxpayers...” A life-cycle cost analysis of the new system can help the town take steps to avoid what might otherwise become a “hidden financial burden on taxpayers and a long-term weight on the economy”, as also stated in the state POCD.

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

Sincerely:

A handwritten signature in blue ink, appearing to read "Bruce Wittchen".

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

Replies to OPM Comments (December 8, 2022) RE: Notice of Scoping for Bozrah Sanitary Sewer Extension, Bozrah, CT

General Comments:

1) **Segments 4A and 4B - Bozrah Street Extension**

Segments 4A (Southeast on Bozrah Street Extension) and 4B (Northeast on Fitchville) are not included in the sewer service area. Because these areas could flow via gravity and potentially connect to the sewer system in the future, we included these flows in sizing the sanitary sewers and pump stations, so they would not require to be upgraded or replaced in the future.

The properties along the gravity sewer mains along Route 87 in Franklin are not included for connection as part of this project. They are on large lots and do not have significant wastewater flows. They were not part of the Franklin EIE, as that EIE focused on properties that fronted on Route 32 and New Park Avenue in Franklin.

2) **Potential Project Expansion to Gilman section of Bozrah and Lebanon**

This project did not consider potential expansion to the Gilman section of Bozrah (approximately 15,500 feet of additional mains) and beyond into Lebanon. This potential expansion was not considered to the speculative nature of the proposed development, as well as the high cost.

3) **Status of Inter-Municipal Agreements**

Bozrah has an Inter-Municipal Agreement (IMA) with Norwich, for the Route 82 sewer project, which allows up to 11,500 GPD discharge.

As recently communicated, Norwich has an additional **1.9 MGD** of capacity available to surrounding communities on a first come, first served basis. If this project moves forward, Bozrah will amend its IMA with Norwich to include the estimated **0.16 MGD** flows from the Fitchville Village/Stockhouse Road project.

Franklin has their own IMA with Norwich. Its facilities were designed with sufficient capacity to accommodate the entire 0.16 MGD potential flows from Bozrah.

4) **Sewer Extension to Possibly Support Bozrah's Affordable Housing Plan**

As noted, future planning documents reference the benefits of future sewer extensions to help facilitate favorable growth within the Fitchville village area of Town. The presence of sewers will allow types of in-fill development, including mixed-use and multi-family options.

5) **Best Management Practices in Bozrah to Reduce CSO Occurrences in Norwich**

Based on recent communications with Larry Sullivan, Water & Wastewater Operations Integrity Manager “the [existing Town of Bozrah] sewer system on Route 82 is a separated system...this system flows through a series of gravity and forced sewer mains to the WWTP...This is also the case (for the Proposed Fitchville Village/Stockhouse Road) for any flows from the Route 32 section of the sewer.” Based on Mr. Sullivan’s detailed knowledge of this sewer system, we agree with him that current and future flows from Bozrah will not increase the frequency of CSO’s.

BMP’s proposed in Bozrah include using modern materials and installation methods including gasketed PVC gravity sewer pipe, pre-cast manholes and rigorous leakage testing of piping and manholes prior to acceptance for use.

The DEEP’s suggestions of utilizing low pressure sewers in lieu of conventional PVC gravity sewers were considered, but eliminated, due to the small potential reduction in inflow/infiltration, and the significant difficulty in convincing property owners that 92 individual pumping systems with their operational and electrical burdens placed on property owners is a good deal.

6) **Life Cycle Costs**

See attached calculations. In addition to the initial capital costs, long-term operation and maintenance costs include contract operations, power, routine and emergency maintenance, and planning for pump replacement.

Over a 20 year operation cycle, the estimated annual cost to operate the sewer system is \$ 200,000, which would be spread over potentially 160 service connections.

ESTIMATED ANNUAL O&M COST
TOWN OF BOZRAH SANITARY SEWER SYSTEM
BOZRAH, CONNECTICUT

ITEM	ANNUAL COST	COST BASIS
Electricity (4 pump stations)	40,000	(\$10,000/Yr/station)
Certified Wastewater Operator	30,000	New Laboror (1/2 time)
Routine Pump Station Maintenance (4 Stations)	40,000	(\$10,000/Yr/station)
Emergency Pump Station Maintenance (4 Stations)	20,000	(\$ 20,000 event)
Sewer Collection System Maintenance	10,000	
Billing and Collections	8,000	
Pump Replacement (every 10 years)	16,000	Duplex stations, 8 pumps total, \$ 20,000 per pump replacement)

ESTIMATED ANNUAL COST **164,000**

CONTINGENCIES (20 %) 32800

ESTIMATED ANNUAL COST (w
Contingencies) 196,800

SAY \$200,000

From: [Matthew N. Brown](#)
To: [Poon, Anthony](#)
Cc: [Esguerra, Carlos](#); jericson@haleyward.com; [William Ballinger](#)
Subject: RE: Bozrah CT EIE - Response to Comments
Date: Thursday, September 14, 2023 3:31:22 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[Updated DEEP EIE Review Comments 9-14-23.pdf](#)

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Anthony-

Please find a revised version of the response package.

Paragraphs 8 and 13 have been updated and one table and figure have been added.

In summary, there are 6 undeveloped parcels that were previously identified as prime farmland. Five of these are open space parcels owned by the Town and State. The sixth is a 1.6 acre privately owned property at 66 Stockhouse Road that is wooded, zoned I-80, and has significant wetlands present.

Let us know if you have any additional questions. Thanks

Matthew N. Brown, P.E.

Vice President

Barton&Loguidice

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From: Poon, Anthony <Anthony.Poon@ct.gov>
Sent: Wednesday, August 30, 2023 12:53 PM
To: Matthew N. Brown <mbrown@bartonandloguidice.com>
Cc: Esguerra, Carlos <Carlos.Esguerra@ct.gov>; jericson@haleyward.com
Subject: RE: Bozrah CT EIE - Response to Comments

ATTENTION --> This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Hi Matthew,

Thank you for sending this in. We are currently reviewing the documents that you sent in. In the document with Bozrah's response to DEEP's comments, it references a table and a farm land overlay map. I did not see those two things anywhere in the document, so I wanted to see if you can send us those referenced documents.

Thank you,
Anthony

Anthony Poon

Environmental Engineer I
Water Planning and Management Division
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*Conserving, improving, and protecting our natural resources and environment;
Ensuring a clean, affordable, reliable, and sustainable energy supply.*

 | portal.ct.gov/DEEP

From: Matthew N. Brown <mbrown@bartonandloguidice.com>
Sent: Thursday, August 24, 2023 1:13 PM
To: Poon, Anthony <Anthony.Poon@ct.gov>
Cc: William Ballinger <bill@ballinger225.com>; Jim Ericson <jericson@haleyward.com>
Subject: Bozrah CT EIE - Response to Comments

You don't often get email from mbrown@bartonandloguidice.com. [Learn why this is important](#)

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Anthony-

Please find the responses to comments received by the Town of Bozrah on the EIE submitted in support of their proposed sanitary sewer extension. Responses to comments prepared by yourself as well as OPM are included. I have also attached the original comments received for easy reference in reviewing.

Please let us know if you have any questions or require further information.

Thank you.

Matthew N. Brown, P.E.
Vice President

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Replies to DEEP Comments (October 5, 2022) RE: May 2022 EIE, Bozrah Sanitary Sewer Extension, Bozrah, CT

General Comments:

1st Paragraph - Increasing Frequency of Combined Sewer Overflows (CSO's) in Norwich

We respectfully disagree with your conclusion. Based on recent communications with Larry Sullivan, Water & Wastewater Operations Integrity Manager “the [existing Town of Bozrah] sewer system on Route 82 is a separated system...this system flows through a series of gravity and forced sewer mains to the WWTP...This is also the case [for the Proposed Fitchville Village / Stockhouse Road] for any flows from the Route 32 section of the sewer.” Based on Mr. Sullivan’s detailed knowledge of his sewer system, we agree with him that current and future flows from Bozrah will not increase the frequency of CSO’s.

We expect that you are aware that Norwich is proceeding with bidding and construction of a new wastewater treatment plant, rated for 8.5 MGD dry weather flow, and 20 MGD wet weather flow. In addition to the current 11,500 GPD Bozrah capacity purchased for the Route 82 sewer project, Mr. Sullivan indicated that it still has 1.9 MGD capacity in their plant that can be purchased by neighboring towns on a first come, first served basis.

2nd Paragraph- Mitigating Measures

As discussed in Item 1 above, additional contributions of Bozrah wastewater to the Route 32 section of gravity sewers will not increase the frequency or magnitude of CSO occurrence in Norwich. Installing modern PVC gravity sewers with gasketed joints, and sealed pre-cast concrete manholes, each tested for potential leakage, will be the best mitigating measure to minimize any inflow or infiltration additions to flow in Bozrah.

3rd Paragraph, Pre-Existing Sewers or New Sewers

The proposed Fitchville Village and Stockhouse Road sewer project will consist of new sewers. There are no existing sewers in this area.

The Town does have one area along Route 82, in the southern section of Bozrah, that connects the Elmbrook Senior Housing project to Norwich sanitary sewers, but that is approximately 5 miles away.

Based upon using modern gasketed PVC gravity sewer pipe and sealed pre-cast concrete manholes, inflow and infiltration into the new Bozrah sewer system should be minimal.

While we agree that using low pressure sewers could serve to potentially eliminate inflow and infiltration flow additions, it will require grinder pump and wastewater pumping chambers at all of the initial 92 properties served by the sewer system. Subsequently, the ownership, power cost, and maintenance of these grinder pumps is almost always the property owners, and presenting this option at a town meeting would surely face strong opposition.

The small benefit to the environment of the small amount of potential inflow/ infiltration savings needs to be weighed with the increase energy use and carbon footprint of the 92 privately-owned grinder pump systems, as well as the potential for wastewater discharges from poorly maintained private systems.

Additional Questions:

1) **Funding Sources**

In addition to the proposed \$5 million state grant, Bozrah will likely apply for the balance of the project cost from the USDA – *Rural Development Grant / Loan Program*.

2) **Status of the Inter-Municipal Agreements between Bozrah, Franklin and Norwich**

Bozrah has an Inter-Municipal Agreement (IMA) with Norwich, for the Route 82 sewer project. A copy of this agreement is attached.

As noted above, Norwich has an additional 1.9 MGD of capacity available to surrounding communities on a first come, first served basis and if this project moves forward, Bozrah will amend it's IMA with Norwich to include flows from the Fitchville Village / Stockhouse Road project.

Franklin has their own IMA with Norwich. Its facilities were designed with sufficient capacity to accommodate the entire **0.16 MGD** potential flows from Bozrah.

3) **Existing Septic System Conditions within Proposed Sewered Area**

The proposed sewered area includes portions of Fitchville Village, Stockhouse Road, and the adjacent commercial/industrial areas. The oldest areas and the ones with the oldest septic systems are located in Fitchville Village, including Fitchville Road, Horseshoe Road and River Road. Many of the structures here are duplex units on small lots, built as mill housing over 100 years ago.

The Uncas Health District was contacted and copies of any septic system mapping or permits for septic repairs over the past 10 years were requested. Table 1 provides a summary of building construction dates and septic system construction dates (where known) . In general, over 80% of the properties have not done any repairs or improvements to them.

Given the age of housing, the extremely tight density, and Fitchville Village's location adjacent to and above Fitchville Pond, most septic tank effluent is likely flowing towards Fitchville Pond, with little or no area for dilution to occur.

4) **Dust Control Measures during Construction**

Modern construction specifications provide multiple measures for dust control. Typically, sanitary sewers are installed in paved town roadways. These roadways require temporary trench patching, either at the end of the day or, at most, at the end of each week.

For trenches in non-paved areas, temporary and permanent grass restoration takes place.

5) **I/I Problems in Franklin**

There are no known Inflow/Infiltration problems in Franklin. The system went on-line in 2020, is only three years old, and was constructed with modern gasketed PVC gravity sewer and pre-cast concrete manholes.

6) **Potential Floodplain Issues**

All four wastewater pumping stations will be installed above the 100-year floodplain elevation. Any gravity sewers within floodplain areas will have bolted, gasketed covers. All work will meet requirements of TR-16 guidance documents.

7) **Potential Direct and Indirect Traffic Impacts**

Minor traffic impacts almost always take place with utility construction in paved roads. A Maintenance and Protection of Traffic (MPT) is part of contract documents, which specify measures contractors must take to minimize traffic impacts (minimum one lane of travel at all times, specify traffic control personnel, etc.). Direct impacts will be minor for the duration of construction and are usually limited to the immediate area of construction.

Indirect traffic impacts typically deal with impacts associated with growth brought about by the presence of sanitary sewers. As much of the sewer service area is already nearly fully developed, no or limited additional growth is anticipated due to sanitary sewer installation.

8) **Farmland Impact of New Development due to Sewers**

The prime farmland mapping was reviewed and the proposed sewer area was overlaid. With the exception of 6 parcels, the entire area designated as Farmland soils is already developed along the Fitchville Road and Stockhouse Road corridors, along with the adjacent side streets. See attached map and table indicating these parcel locations.

Of these 6 undeveloped parcels, three are owned by the Town of Bozrah as open space, two are owned by the State of Connecticut and are within the Yantic River floodplain and non-buildable, and only one remaining parcel, a 1.6 acre Industrial zoned parcel with wetlands present.

9) **Camp Odetah Connection Impact**

Camp Odetah operates a seasonal campground on the shore of Fitchville Pond in Bozrah. Wastewater is currently collected in large holding tanks, which are pumped out weekly during the peak season. Estimated peak flows during the summer are 25,000 GPD. As this population is highly transient and drops off during the week, long term impacts to service population are not applicable.

10) **Wood Turtle Mitigation Measures**

The one identified threatened and endangered species within the project area, the Wood Turtle, will be the focus of protection measures during their November 1- March 31 hibernation period. A qualified herpetologist will be part of the design team, develop wood

turtle identification plans and mitigating measures, in the event they are encountered during construction. The majority of the sanitary sewer work will take place in the paved roadways, not ideal turtle habitat. The sewer pumping stations would be located off the road, and measures to protect wood turtles would be in place throughout construction.

11) **Updated Plan of Conservation and Development**

We reviewed the updated 2018-2023 plan, and the updated plan has no impacts on the submitted EIE.

12) **Impacts on Growth Management Potential Identified**

See attachment prepared by Sam Alexander, Southeastern Connecticut Council of Governments.

13) **Farmland Parcels**

As noted in Item 8, there are six undeveloped parcels identified as either prime farmland or farmland of statewide importance.. Five of them are owned either by the Town of Bozrah or State of Connecticut and maintained as open space, with only one privately-owned undeveloped parcel remaining. This 1.6 acre parcel is wooded, has significant wetlands present, and is zoned industrial (I-80).

14) **Residential Areas**

The proposed sewer area extends through Fitchville Village, including a high density area of single and multi-family housing. Approximately 35 of the total 45 potential connections within Fitchville village are for residential properties.

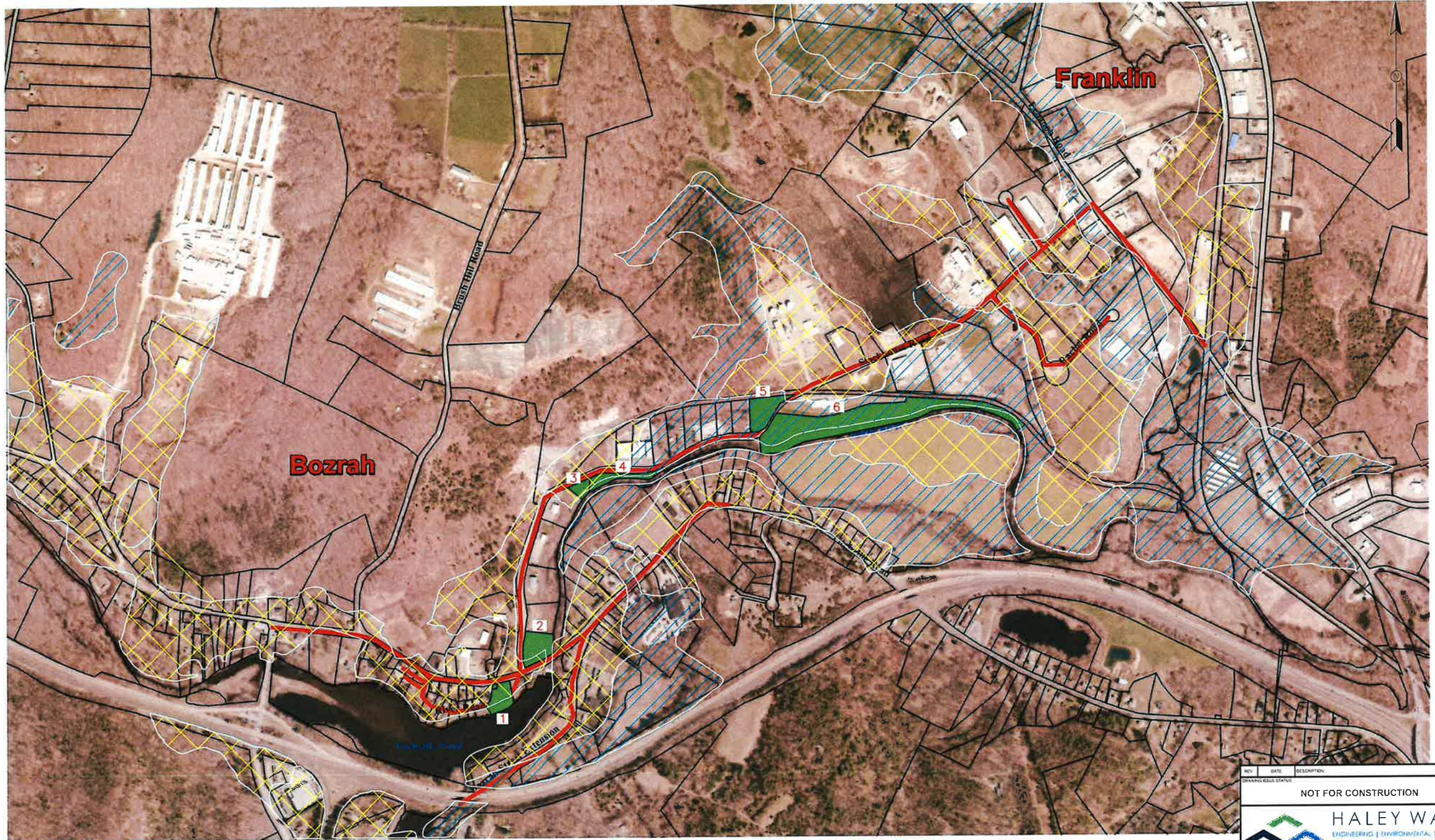
The addition of sanitary sewers to these properties, and the elimination of septic systems, will be a great benefit to all these property owners whose property values will increase.

15) **Resolve Conflict Regarding Impacts on Potential Impacts on Conservation Areas**





Based on a review of the current 2018-2023 State Plan of Conservation and Development, the proposed sewer service area DOES NOT encroach on conservation areas.

UNDEVELOPED PARCELS w/ OWNERS
 TOWN OF BOZRAH, CT

Marker	Location	Parcel	Owner	Property Type	Status	Zone	Comments
1	River Road	13-07/028-029	Bozrah, Town of	Residential	Undeveloped	R-2	Town owned parcel adjacent to Fitchville Pond.
2	Stockhouse Road	13-04/017-05	Bozrah, Town of	Commercial	Undeveloped	C	Town open space.
3	Stockhouse Road	13-04/017-A	Bozrah, Town of	Vacant Land	Undeveloped	C	Town open space.
4	Stockhouse Road	13-04/018	Connecticut, State of	Vacant Land	Undeveloped	I-80	Adjacent to Yantic River.
5	66 Stockhouse Road	13-04/024	Palmer, Kenneth James	Residential	Undeveloped	I-80	Wooded, privately owned parcel.
6	Stockhouse Road	13-04/056-02	Bozrah, Town of	Vacant Land	Undeveloped	I-80	Adjacent to Yantic River.



LEGEND

-  PRIME FARMLAND
-  FARMLAND OF STATEWIDE IMPORTANCE
-  PROPOSED SEWER EXTENSION
-  UNDEVELOPED PARCEL

NOTES :

1. UNDERGROUND UTILITY, STRUCTURE AND FACILITY LOCATIONS DEPICTED AND NOTED HEREON HAVE BEEN COMPILED, IN PART, FROM RECORD MAPPING SUPPLIED BY THE RESPECTIVE UTILITY COMPANIES OR GOVERNMENT AGENCIES. THESE LOCATIONS MUST BE CONSIDERED AS APPROXIMATE IN NATURE. THE SIZE, LOCATION AND EXISTENCE OF ALL SUCH FEATURES MUST BE FIELD DETERMINED AND VERIFIED BY THE APPROPRIATE AUTHORITIES PRIOR TO CONSTRUCTION. CALL BEFORE YOU DIG 1-800-922-4455.


REV	DATE	DESCRIPTION	BY	CHK
DRAWING STATUS:				
NOT FOR CONSTRUCTION				
 HALEY WARD ENGINEERING ENVIRONMENTAL SURVEYING 2710 Main St. Eastford, Connecticut 06035 860.659.3100 WWW.HALEYWARD.COM				
PROJECT:				
SEWER MAIN EXTENSION TOWN OF BOZRAH, CT				
TYPE:				
FARMLAND & PARCEL OVERLAY				
DATE:		SCALE:		
2023.09.14		AS NOTED		
DRAWN BY:	DESIGNED BY:	CHECKED BY:		
RP				
PROJECT NO:	CONTRACT NO:			
4010187.21387				
DRAWING NO:	REV:			

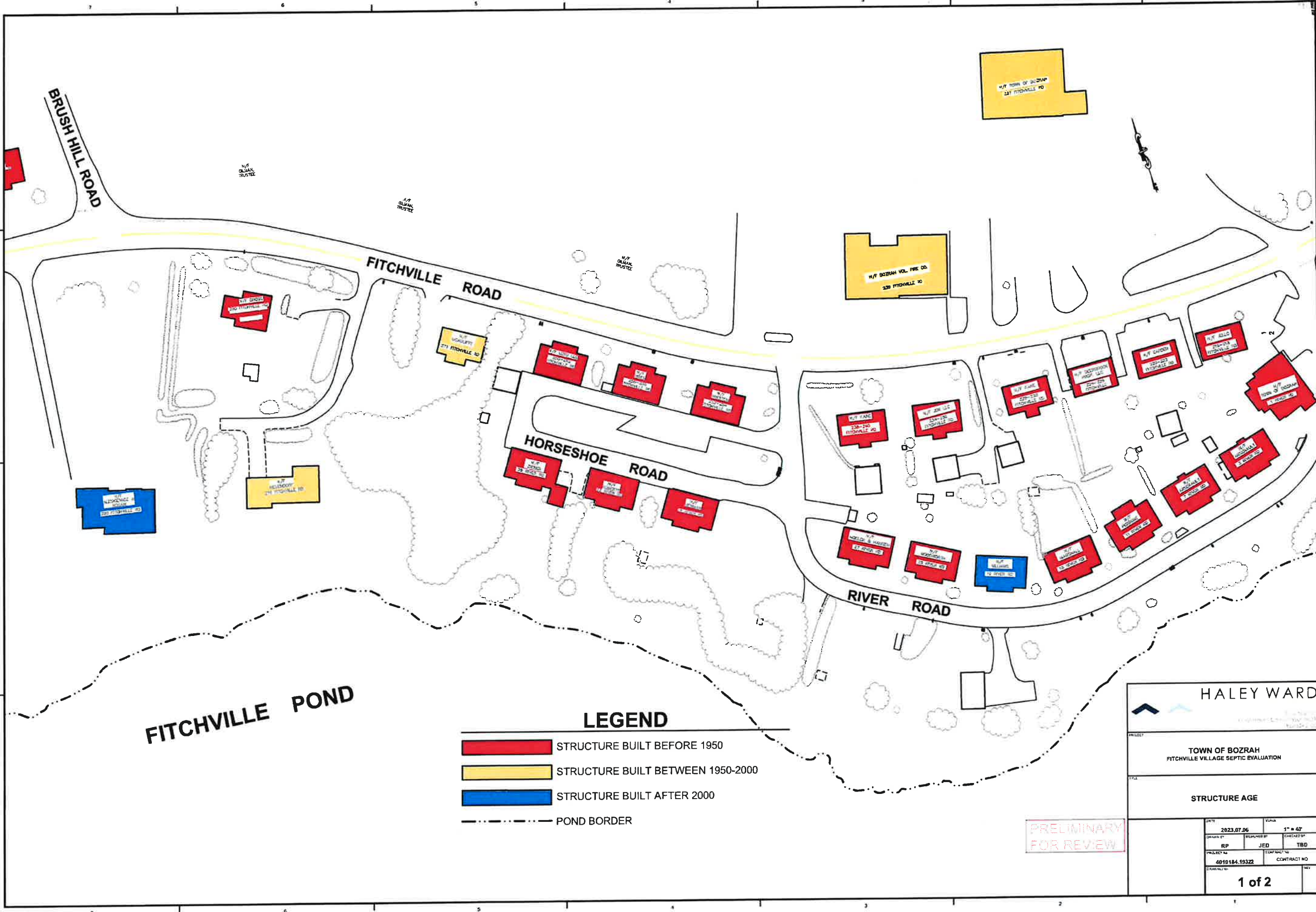
TABLE AND FIGURES SHOWING
CURRENT HOUSING AGE AND
SEPTIC SYSTEM AGE AND CONDITIONS WHERE KNOWN.

TABLE 1

Fitchville Village Septic System Evaluation

Town of Bozrah

Location	Owner	Property Type	STATUS	Facility	Septic System Info (Y/N)	Date Installed	Year Constructed
2 Brush Hill Road	Shiff David & Ina M Revocable Living Tru David & Ina M Shiff	Residential	Single Family	Convenient store	N		1945
194 Fitchville Road	194 Fitch LLC	Commercial	Business	Office	N		1890
195 Fitchville Road	Gebbie Darwin C	Residential	Apartments	Apartment House	N		1882
197 Fitchville Road	Gebbie Darwin C	Residential	Single Family	Home	N		1900
199 Fitchville Road	Lavorato Joyce	Residential	Single Family	Home	N		1900
210 Fitchville Road	Fleming Reuben B + Marcia P	Residential	Single Family	Home	Y	N/A	1850
213 Fitchville Road	Pappas Jeffrey J & Shafer Marianne L	Residential	Single Family	Home	Y	12/15/2005	1800
215 Fitchville Road	Sayles Jr John C	Residential	Single Family	Home	N		1800
216 Fitchville Road	Jello Barbara A Alu Edna M- Life Use	Residential	Multi-Family	Apartment House	N		1910
222 Fitchville Road	Carden Betty J	Residential	Multi-Family	Apartment House	N		1910
224 Fitchville Road	Deerbrook Properties	Residential	Multi-Family	Apartment House	N		1910
227 Fitchville Road	Bozrah Town of	Municipality	Town Garage	Office	N		1973
228 Fitchville Road	Kane Williams A Jr + Theresa H	Residential	Multi-Family	Apartment House	N		1910
234 Fitchville Road	JDK LLC	Residential	Multi-Family	Apartment House	Y	N/A	1910
239 Fitchville Road	Bozrah Volunteer Fire Co.	Municipality	Fire Department	Office	N		1966
240 Fitchville Road	Kane Williams A Jr + Theresa H	Residential	Multi-Family	Apartment House	Y	5/21/1964	1910
252 Fitchville Road	Preston Richard L	Residential	Multi-Family	Apartment House	Y	3/30/1995	1910
256 Fitchville Road	Pires Luis & Palmira	Residential	Multi-Family	Apartment House	Y	N/A	1910
260 Fitchville Road	Leru LLC	Residential	Multi-Family	Apartment House	Y	N/A	1910
272 Fitchville Road	McAuliffe Maureen	Residential	Single Family	Home	N		1955
276 Fitchville Road	Neuendorf Richard E & Elaine S	Residential	Single Family	Home	N		1950
280 Fitchville Road	Gross Kerry	Residential	Single Family	Home	Y	10/14/2003	1940
290 Fitchville Road	Aleskiewicz Michael Peter & Rogan Elena	Residential	Single Family	Home	Y	9/24/2007	2007
300 Fitchville Road	Morrisette Raymond Troy	Residential	Multi-Family	Apartment House	N		1930-1978
305 Fitchville Road	Murphy John E + Caroline M	Residential	Single Family	Home	N		1922
309 Fitchville Road	Sullivan Brian	Residential	Single Family	Home	N		1952
313 Fitchville Road	Mitchell Francis + Margaret J	Residential	Single Family	Home	N		1940
317 Fitchville Road	Maddx Jason S	Residential	Multi-Family	Apartment House	Y	N/A	1900
318 Fitchville Road	Main's General Store		Business	Office	N		1930
1 River Road	Bozrah Town of	Municipality	Town Hall	Office	Y	N/A	1860
3 River Road	Arsenault Joseph	Residential	Multi-Family	Apartment House	N		1905
7 River Road	Arsenault Michele	Residential	Multi-Family	Apartment House	N		1905
11 River Road	Perrone Angelo J + Martha L	Residential	Multi-Family	Apartment House	N		1905
15 River Road	Marshall Catherine J	Residential	Multi-Family	Apartment House	N		1905
18 River Road	Newman Eric J & Tina L	Residential	Multi-Family	Apartment House	Y	10/28/1994	1900
19 River Road	William James E & Sandra L	Residential	Multi-Family	Apartment House	N		2015
22 River Road	Roberts Norma	Residential	Multi-Family	Apartment House	N		1900
25 River Road	Woodworth Patricia	Residential	Single Family	Home	N		1905
26 River Road	Zieber Rick I	Residential	Multi-Family	Apartment House	N		1900
27 River Road	Hoelck Frank & Hansen Cecile	Residential	Multi-Family	Apartment House	N		1905
2 Stockhouse Road	Gebbie Family LLC	Residential	Apartments	Apartment House	Y	N/A	1900
7 Stockhouse Road	Adelman Seymour	Commercial	Undeveloped		N		N/A
Stockhouse Road	Bozrah Town of	Municipality	Undeveloped		N		N/A
12 Stockhouse Road	DNS Group LLC	Commercial	Developed	Office	N		1986
15 Stockhouse Road	Triple T Enterprises	Commercial	Developed	Office	Y	N/A	2006
Stock, Fitch, Brush	Gilman		Undeveloped		N		N/A



FITCHVILLE POND

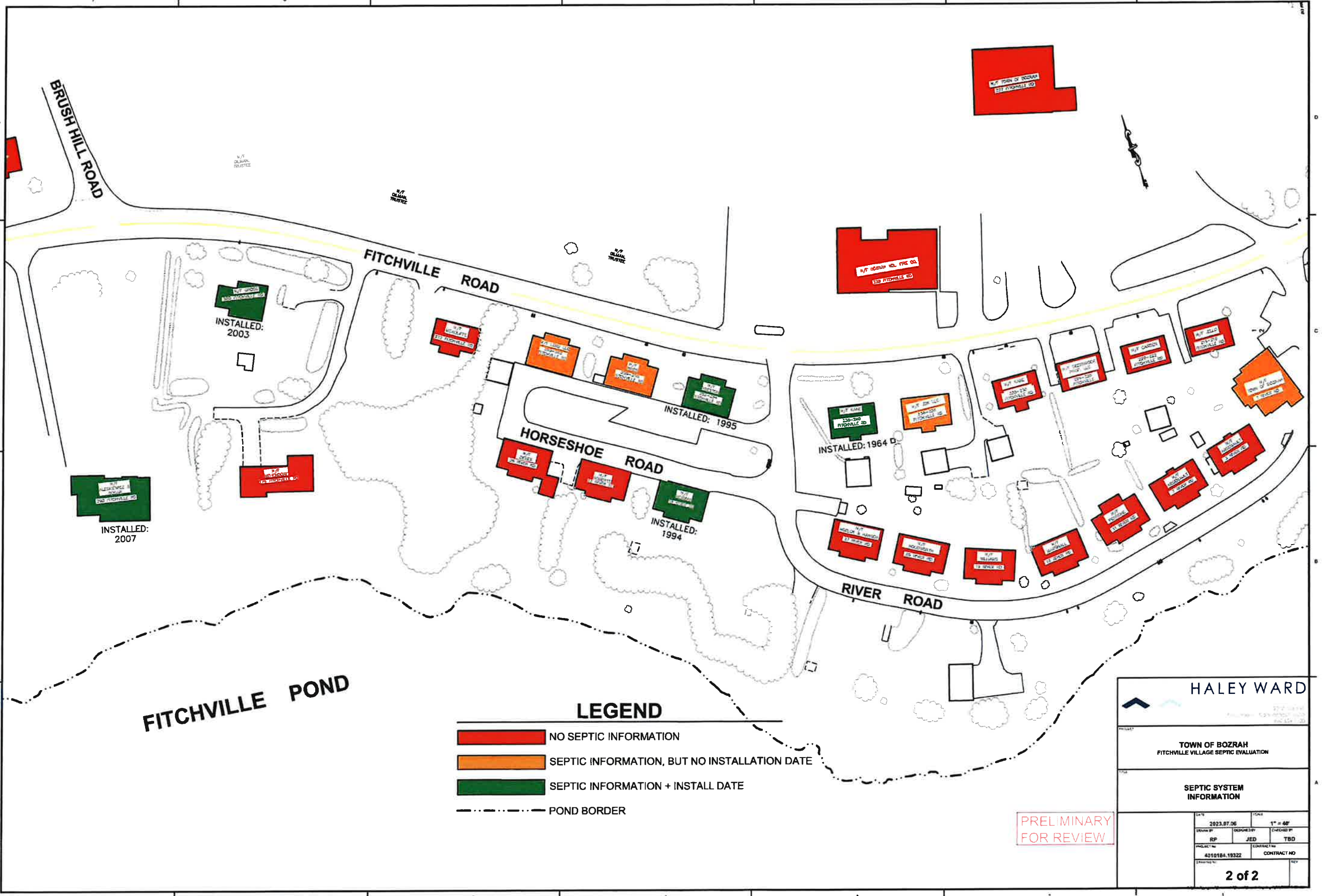
LEGEND

- STRUCTURE BUILT BEFORE 1950
- STRUCTURE BUILT BETWEEN 1950-2000
- STRUCTURE BUILT AFTER 2000
- POND BORDER

HALEY WARD <small>Engineering & Surveying</small>			
TOWN OF BOZRAH FITCHVILLE VILLAGE SEPTIC EVALUATION			
STRUCTURE AGE			
DATE	SCALE	1" = 40'	
DESIGNED BY	DRAWN BY	CHECKED BY	
RP	JED	TBD	
PROJECT NO.	CONTRACT NO.		
4010184.19322			
1 of 2			

PRELIMINARY FOR REVIEW

HALEY WARD & ASSOCIATES, INC. 1000 W. MAIN ST. BOZRAH, MS 38954-1000



BRUSH HILL ROAD

FITCHVILLE ROAD

HORSESHOE ROAD

RIVER ROAD

FITCHVILLE POND

LEGEND

- NO SEPTIC INFORMATION
- SEPTIC INFORMATION, BUT NO INSTALLATION DATE
- SEPTIC INFORMATION + INSTALL DATE
- POND BORDER

HALEY WARD

TOWN OF BOZRAH
FITCHVILLE VILLAGE SEPTIC EVALUATION

SEPTIC SYSTEM INFORMATION

DATE	2023.07.06	SCALE	1" = 40'
DRAWN BY	RP	DESIGNED BY	JED
CHECKED BY	TSD	CONTRACT NO.	
PROJECT NO.	4010184.19322	CONTRACT NO.	

PRELIMINARY
FOR REVIEW

ATTACHMENT PREPARED BY SAM ALEXANDER
SOUTHEASTERN CONNECTICUT COUNCIL OF GOVERNMENTS

SOUTHEASTERN CONNECTICUT COUNCIL OF GOVERNMENTS

5 Connecticut Avenue, Norwich, Connecticut 06360
(860) 889-2324/Fax: (860) 889-1222/Email: office@seccog.org

July 11, 2023

Anthony Poon
Sanitary Engineer I
Bureau of Water Protection and Land Reuse
Connecticut Department of Energy and Environmental Protection
79 Elm Street
Hartford, CT 06106

RE: Draft Bozrah Sanitary Sewer Extension Project Environmental Impact Evaluation review comment #12 of October 5, 2022 correspondence, pertaining to consistency with the State Plan of Conservation and Development.

Mr. Poon:

I am in receipt of your October 5, 2022 letter to the Town of Bozrah regarding your review of a Draft Environmental Impact Evaluation (EIE) for its proposed Sanitary Sewer Extension Project. This response letter is specifically in reference to review comment #12.

12. Section 8.2: Please be aware that sewer extensions impacting Balanced Funding Areas (BPFAs) need to be reviewed and assessed in relation to the Growth Management Principles included in the current State Plan of C&D. For this task, DEEP suggests that you coordinate with Bozrah's planning and zoning officer to document how the project will meet the goals and objectives of the GMPs included in the current State Plan of C&D. The planning and zoning officer should document conformance with only the most relevant and applicable GMPs described in the State plan. Please update the EIE accordingly.

It is my hope that this letter satisfies your review comment above. Please find attached a comprehensive review of the State Plan's Growth Management Principles and objectives, and their relation to this project. Should you have any questions, please contact me at 860.889.2324 or salexander@seccog.org.

Sincerely,


Samuel Alexander, AICP
Planner III / Consulting Town Planner, Town of Bozrah
Southeastern Connecticut Council of Governments

CC: Bozrah Board of Selectmen
Jim Ericson, PE, Haley Ward

Attachment

Member Municipalities: Bozrah * Colchester * East Lyme * Franklin * Griswold * Borough of Jewett City * City of Groton * Town of Groton * Lebanon * Ledyard * Lisbon * Montville * New London * North Stonington * Norwich * Preston * Salem * Sprague * Stonington * Stonington Borough * Waterford * Windham

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ATTACHMENT

Discussion of Fitchville and Stockhouse Road / Area of Planned Sewer Extension:

The planned sewer extension would reach the village of Fitchville via the Stockhouse Road corridor. Stockhouse Road is the most direct route from the existing sewer system in Franklin, to Fitchville, and it is an area with significant commercial and industrial activity. The village of Fitchville, in the area generally surrounding Fitchville Road between Haughton Road and Goulart Drive, and areas surrounding Fitchville Pond, is a historic mill village and the civic center of the Town of Bozrah.

Utilities

Water service from Norwich Public Utilities (NPU) exists in both the Stockhouse Road corridor and in Fitchville.

Plans

The Bozrah Plan of Conservation and Development (POCD) was last updated in 2015. The POCD states the following about Fitchville and Stockhouse Road:

- *According to survey response preference is to promote public sewer/water in the Stockhouse Road – Fitchville area followed by the Salem Turnpike.*
- *The Fitchville area of town has been recently delineated as a Village Center in the town zoning regulations. This designation provides incentives for mixed use development under certain conditions.*
- *Community Development Goal: Promote the enhancement of the existing densely settled village areas of Fitchville and Gilman.*
- *Community Development Goal: Promote the expansion of public utilities in areas deemed appropriate by this plan.*
- *The Future Land Use Map on page 30 identifies the Fitchville village area and the Stockhouse Road corridor as an “Area appropriate for public utility expansion”.*

The Bozrah Affordable Housing Plan:

- *Fitchville provides the greatest opportunity for new multi-family or two-family housing, as well as housing for seniors. Fitchville is the civic center of Bozrah, it contains the Town Hall, the school, a general store, the Post Office, and a diversity of housing types. Many of the existing mill housing duplexes are naturally affordable.*
- *Proactively plan for sewer expansion that is expected in the medium- and long-term. Assess how zoning may change in an area like Fitchville if sewer is extended, and the types of infill development, including mixed-use and multi-family options that would be possible. It is important that the Town, primarily through the Planning & Zoning Commission articulate its goals for growth and adapt zoning to changing conditions. The 2025 POCD would be an opportune time to begin this planning.*

Zoning

Zoning in Fitchville supports a mixed-use-style, traditional New England village setting. The existing land uses include commercial, civic, educational, religious, single-family, and multi-family land uses, including duplex-style antique housing formerly associated with large mill that once stood in the center of the village. Zoning was revised parallel to the most recent POCD to create the Village Overlay District,

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which has the goal of encouraging infill development and housing choice; however, progress has been hindered by unavailability of sewer infrastructure.

Zoning in the Stockhouse Road corridor is for commercial and industrial land uses. Stockhouse Road is part of a much larger, regionally significant industrial asset: a tri-town corridor proximate to Routes 2 and 32, and Interstate 395, straddling the Norwich, Franklin, and Bozrah tripoint, and which includes the Stanley Israelite Industrial Park in Norwich and Franklin. The existence of this corridor, in itself, is consistent with Smart Growth principles of concentrating industrial land uses on lands capable of supporting those uses and proximate to major transportation corridors. Businesses in the Stockhouse Road corridor in Bozrah are supportive of regionally significant industries, such as shipbuilding.

Planned Projects

The Town of Bozrah is expecting to receive a commitment to fund a planned Local Transportation Capital Improvement Program (LOTICIP) project, which would establish continuous sidewalks along Fitchville Road between the Fitchville Post Office and Haughton Road. LOTICIP is a CT Department of Transportation (CT DOT) capital projects program. The Town of Bozrah has completed a design of this project.

Other

The Fitchville Historic District is a State of Connecticut Register-designated district. There are 81 structures, sites, and properties in Fitchville that contribute to the district and are registered on the State Register. These properties, if connected to the planned sewer system, would be more attractive to future investment and reinvestment by property owners wishing to maintain them.

Comparison of Planned Project to State POCD Growth Management Principles:

GMPs / Objectives	Consistency with this Project
<p>GROWTH MANAGEMENT PRINCIPLE #1: Redevelop and Revitalize Regional Centers and Areas with Existing or Currently Planned Physical Infrastructure</p>	<ul style="list-style-type: none"> Fitchville is an area of planned growth in Bozrah, including multi-family residential uses in keeping with the village atmosphere. Planned growth compliments a changing regional demographic and regional economic activity such as hiring at General Dynamics Electric Boat. Industrial and commercial activity along Stockhouse Road is growing and will be further enabled by a sewer extension. Industries in the Stockhouse Road corridor include companies such as Collins & Jewell, which support shipbuilding. The Stockhouse Road corridor is part of a larger industrial corridor proximate to Routes 2 and 32 and Interstate 395 in Franklin, Bozrah, and Norwich, and which includes the Stanley Israelite Industrial Park in Norwich. This entire three-town corridor is a regionally significant asset. Fitchville’s existing zoning supports mixed uses, a diversity of residential uses, commercial and industrial uses.
<p><i>1.5 Coordinate the timing of any planned expansion of existing infrastructure to meet state and regional growth objectives;</i></p>	
<p><i>1.10 Encourage local zoning that allows for a mix of uses “as-of-right” to create vibrant central places where residents can live, work, and meet their daily needs without having to rely on automobiles as the sole means of transport;</i></p>	

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<p>GROWTH MANAGEMENT PRINCIPLE #2 Expand Housing Opportunities and Design Choices to Accommodate a Variety of Household Types and Needs</p>	<ul style="list-style-type: none"> • Sewer extension would enable infill housing in the village of Fitchville, consistent with recommendations of the municipal POCD, Affordable Housing Plan, and as intended by the Village Overlay District in the zoning regulations.
<p><i>2.5 Support local efforts to develop appropriate urban infill housing and neighborhood amenities to make better use of limited urban land;</i></p>	<ul style="list-style-type: none"> • Fitchville and Stockhouse Road are located inside of the census-designated Norwich-New London urban boundary.
<p>GROWTH MANAGEMENT PRINCIPLE #3 Concentrate Development around Transportation Nodes and Along Major Transportation Corridors to Support the Viability of Transportation Options</p>	<ul style="list-style-type: none"> • Connecticut Route 2 cuts through the village of Fitchville, and there are exits and on-ramps in both east- and west-bound directions. Route 2 allows commuters and goods to reach Hartford to the west.
<p><i>3.1 Promote compact, pedestrian-oriented, mixed use development patterns around existing and planned public transportation stations and other viable locations within transportation corridors and village centers;</i></p>	<ul style="list-style-type: none"> • Fitchville is only three miles along Route 2 from Interstate 395, which allows commuters and goods to access New London and points south (New Haven, New York) and Worcester, MA and points north (Boston). • Stockhouse Road is located between Fitchville and Route 32, another major corridor for inter-regional traffic.
<p>GROWTH MANAGEMENT PRINCIPLE #4 Conserve and Restore the Natural Environment, Cultural and Historical Resources, and Traditional Rural Lands</p>	<ul style="list-style-type: none"> • Fitchville’s existing zoning supports mixed uses, a diversity of residential uses, commercial and industrial uses. The zoning is specifically designed to incentivize, by allowing additional density, to developments that specially retain a New England village character. Zoning is poised to preserve the historical assets of Fitchville and its State-designated historic district. Sewer will aid in this preservation effort by allowing additional investment and adaptive-reuse of properties.
<p><i>4.7 Revitalize rural villages and main streets by promoting the rehabilitation and appropriate reuse of historic facilities, such as former mills, to allow a concentration of higher density or multiple use development where practical and consistent with historic character;</i></p>	<ul style="list-style-type: none"> • Water quality of Fitchville Pond and the Yantic River will be impacted positively by addition of sewers in such a historically dense area. Fitchville is home to rows of duplex housing associated with a former mill, as well as other intensive users of water on subsurface disposal systems, such as a general store/restaurant and Fields Memorial School.
<p><i>4.14 Rely upon the functional capacity of the land, to the extent possible, to provide drinking water and wastewater disposal needs beyond the limits of the existing service area, and comprehensively manage decentralized sewage and water systems to ensure long term viability of sewage disposal and water supply. Support the introduction or expansion of public water and/or sewer services or alternative on-site wastewater treatment systems only when there is a demonstrated environmental, public health, public safety, economic, social, or general welfare concern, and then introduce such services only at a scale which responds to the existing need without serving as an attraction to more extensive development;</i></p>	<ul style="list-style-type: none"> • Addition of sewer would enable adaptive reuse of properties and encourage reinvestment by property owners. This is expected to benefit the numerous renters in Fitchville, providing not only an economic but a social benefit as well.
<p><i>4.17 Protect, maintain and restore the chemical, physical, and biological integrity of ground and surface waters to ensure that existing and</i></p>	

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<i>designated uses are maintained;</i>	
GROWTH MANAGEMENT PRINCIPLE #5 Protect and Ensure the Integrity of Environmental Assets Critical to Public Health and Safety	<ul style="list-style-type: none"> Water quality of Fitchville Pond and the Yantic River will be impacted positively by addition of sewers in such a historically dense area. Fitchville is home to rows of duplex housing associated with a former mill, as well as other intensive users of water on subsurface disposal systems, such as a general store/restaurant and Fields Memorial School.
GROWTH MANAGEMENT PRINCIPLE #6 Promote Integrated Planning across all Levels of Government to Address Issues on a Statewide, Regional, and Local Basis	<ul style="list-style-type: none"> Bozrah is expecting a commitment under the LOTCIP program for sidewalks in Fitchville. Together with the sidewalk project, sewer infrastructure will make Fitchville a very livable place and attractive place for growth consistent with smart growth principles. Viewed together, the proposed sewer extension project and planned sidewalk project, are cross-governmental efforts in place-making and improving the social, environmental, and economic integrity of a small town's village center.

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September 26, 2023

Town of Bozrah
1 River Road
Bozrah, CT 06334
Attn: Bill Ballinger, First Selectman
Sent via email to: bill@ballinger225.com

Re: Town of Bozrah (Town)
Sanitary Sewer Extension
Draft Environmental Impact
Evaluation (EIE)

Dear First Selectman Ballinger:

The Connecticut Department of Energy and Environmental Protection (DEEP) has reviewed the response submitted by your consultant Barton & Loguidice on August 24, 2023 in response to DEEP's comments related to the above-referenced draft EIE. DEEP understands the importance of this project for the town's economic development and has been actively working to move it forward. However, one substantial issue related to the environmental impact of the sewer extension project remains and has prevented DEEP from completing the Connecticut Environmental Policy Act ("CEPA") process required by law for all state funded projects. Specifically, the issue relates to mitigating the impact of the additional flow from this project to the City of Norwich's combined sewer system.

In a July 16, 2018, letter to First Selectman Glenn Pianka to guide the town's project timeframe, DEEP identified its obligation to complete the environmental process review pursuant to CEPA prior to approving any bid documents. The CEPA review process serves to evaluate the design of proposed state-sponsored projects of potentially adverse environmental impacts and mitigative alternatives to eliminate and/or reduce those impacts to the furthest extent possible.

A draft of the Environmental Impact Evaluation (EIE) for this project was completed by the Town's consultant in May of 2022 without issuing a scoping notice, an important first step in the CEPA review process. The purpose of the Scoping Notice is to solicit initial comments on the project, before design is substantially complete, that must be addressed via the subsequent EIE or post-scoping notice. DEEP's first opportunity to review the project came upon submittal of the draft EIE; review comments on the draft EIE were sent on October 5th, 2022, and a 30-day Scoping Notice was issued on November 6th, 2022. The Office of Policy and Management (OPM) issued comments on the Scoping Notice on December 8, 2022. DEEP understands that Bozrah's

previous consultants, GEI, were unavailable to respond to the EIE comments and therefore the Town hired Barton & Loguidice (B&L) to respond to comments and complete the CEPA review process.

The most significant concern that OPM and DEEP asked the Town to consider was minimizing the additional flow to Norwich, to the maximum extent possible during wet weather and/or saturated ground conditions, to mitigate the risk of discharges of untreated or partially treated sewage in the City of Norwich's system, downstream of the Bozrah's inflow. The EIE has yet to evaluate: 1) the impact of this project on Norwich's Combined Sewer Overflow (CSO) system, 2) the effects of potential impacts on Norwich as an Environmental Justice and distressed community, and 3) the mitigation of project impacts, particularly at a time when the City and state are making significant investments to address Norwich's CSOs. Specifically, these investments are being made to address environmental and public health issues from the City's wastewater system through Norwich Public Utilities (NPU) starting the construction of a long-awaited \$190 million improvement project at its wastewater treatment facility that will be financed by DEEP's Clean Water Fund program.

While the treatment facility upgrade is a key aspect of the overall long term control strategy to improve the quality of local waters, it is only one of several projects that are part of the Norwich CSO Long-Term Control Plan, which will cost hundreds of millions of dollars to complete. The Norwich CSO Long-Term Control Plan lays out a long-term strategy to continue to reduce sewer overflows from discharging into local waters. As noted by B&L in its response, it is correct that the Bozrah project will connect to a portion of the Norwich sewer system that does not have active CSO outfalls; however, any additional flow into the Norwich sewer system will reduce any excess capacity at the treatment facility that is needed to reduce sewer overflows within the collection system. Hence, DEEP's review is focused on ensuring that newly sewered areas within the collection system take reasonable measures to minimize flows, particularly in wet weather and saturated ground conditions.

It is for this reason that DEEP recommended the implementation of a low-pressure sanitary sewer (LPSS) system to make Bozrah's system significantly less vulnerable to infiltration and inflow (i.e., stormwater and groundwater that enters a sewer system) impacts over time. However, DEEP acknowledges that the Town has ruled out the use of LPSS in light of the premature completion of project design and due to cost and maintenance concerns associated with LPSS systems. As an alternative, DEEP strongly advises the use of combination of enhancements to the current design as the next-best alternative to make the collection system more resilient to long term increases in flow. Such features are less costly, are not maintenance intensive, and include the use of a higher-grade pipe material (e.g., C-900 PVC), and possibly

using larger wet wells at the pump stations. Additionally, as a future action, these measures can also be supplemented with the adoption of a strong sewer use ordinance to control illicit sewer connections such as roof leaders or basement sump pumps, as well as for the adoption of a long-term infiltration and inflow control strategy.

We await the Town's response to the design measures recommended above and look forward to addressing this issue in order to proceed to the next step in the CEPA process – publication of a 45-day public notice in the Environmental Monitor and in a local newspaper. Any comments that are received in those 45 days will require a response from the Town so that DEEP can finalize a Record of Decision (ROD) documenting a final recommendation regarding this project. OPM will review the EIE and the ROD and determine if it is adequate, then OPM will publish its Determination of Adequacy in the Environmental Monitor as appropriate.

We understand the importance of this project to the Bozrah community and look forward to finalizing the ROD for this project with your cooperation. If you have any questions regarding this project or if you wish to meet to discuss this correspondence, please contact Anthony Poon of my staff at Anthony.poon@ct.gov.

Sincerely,



Nisha Patel, P.E.

Director

Bureau of Water Protection and Land Reuse
Water Planning and Management Division

e-copies

Senator Catherine Osten

Chris LaRose, General Manager, NPU

Larry Sullivan, NPU



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October 17, 2023

Mr. Anthony Poon
CT DEEP
79 Elm Street
Hartford, CT 06106-5127

RE: Replies to DEEP letter dated September 26, 2023 regarding Town of Bozrah Sanitary Sewer Extension, Draft Environmental Impact Evaluation (EIE)

Dear Mr. Poon:

The Town of Bozrah has the following comments in response to your Department's September 26, 2023 letter. Our responses incorporate discussion items from our October 11, 2023 roundtable TEAMS discussion with DEEP staff, Bozrah Selectman William Ballinger, State Senator Cathy Osten and James Ericson, PE from Haley Ward, Inc.

Your September 26, 2023 letter and our subsequent discussion centered on various commitments the Town of Bozrah can make to the DEEP to:

- 1) minimize impacts on the City of Norwich's existing combined sewage overflows (CSO's),
- 2) minimizing impacts from Bozrah's proposed wastewater discharges on Norwich as an Environmental Justice and distressed community, and
- 3) the mitigation of project impacts, especially during a time when Norwich is starting the construction of a \$ 191 million wastewater treatment plant upgrade.

We will discuss each of these items, to demonstrate how the proposed Town of Bozrah sanitary sewer project will accomplish these goals.

- 1) Minimizing Impacts on existing Norwich CSO's – As noted in previous submissions, the Town of Bozrah's proposed sewer connection location on Route 32 in Franklin, which flows into Norwich, is not on a run of sanitary sewer mains that are subject to Combined Sewer Overflows. Therefore, the addition of Bozrah wastewater discharges into Norwich will not have a direct impact on Norwich's existing CSO's.

Mr. Anthony Poon | 10-17-23 | JN | Page 1

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Even though Norwich has stated that it has adequate capacity to accept the entire 160,000 gpd from this project, the DEEP has concerns that adding this wastewater volume to the Norwich sewer system will reduce the available treatment plant surplus necessary to reduce CSO discharges. The Town of Bozrah acknowledges that fact and will implement measures during design and construction to minimize inflow and infiltration into the new Bozrah sewer system.

- 2) Minimize impacts from Bozrah's proposed wastewater discharges on Norwich as an Environmental Justice and distressed community- As noted in the DEEP's letter and in our discussion, the City of Norwich is an Environmental Justice and distressed community, and the impact of accepting additional wastewater flows from Bozrah needs to be justified.

In addition, Senator Osten made the point that the Fitchville Village section of Bozrah also has high-density, low-income housing with many of the houses relying on very old on-site septic systems on small lots. Any failure of these systems would create a severe economic hardship to these residents, in addition to creating an environmental impact from contamination to Fitchville Pond and the Yantic River. Fitchville Village is the major area within our project where sewers will have the greatest impact.

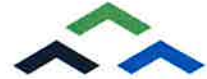
This project will improve the economic conditions to this low-income area of Bozrah, remove the uncertainty of older, sub-standard septic systems and improve water quality in Fitchville Pond and the Yantic River.

The Town of Bozrah acknowledges these facts and will implement measures during design and construction to minimize inflow and infiltration into the new Bozrah sewer system, to reduce impacts to the City of Norwich.

- 3) Mitigation of Potential Impacts to Norwich - The on-going City of Norwich wastewater treatment plant project was discussed, with the City spending approximately \$ 191 million to upgrade the capacity of their plant over the next five years.

As discussed by Selectman Ballinger and Senator Osten, this project has been planned for many years, and has always been seen as a regional project, to meet Norwich's current and future needs, but to also encourage economic growth in the neighboring communities. The additional revenues generated from connection fees on an Equivalent Dwelling Unit (EDU) basis, and flows from outside communities will help reduce the financial burden to Norwich property owners, by spreading the cost over a larger customer base.

The Town of Bozrah acknowledges these facts and will implement measures during design and construction to minimize inflow and infiltration into the new Bozrah sewer system, to reduce impacts to the City of Norwich.



The Town of Bozrah commits to incorporating the following concepts into the final design of the Bozrah Sanitary Sewer Extension project:

- 1) Upgrade of Gravity Sewer Piping Material - To minimize initial and long-term inflow and infiltration, the Town agrees to specify AWWA standard C-900 pressure pipe for gravity sewer mains within the sewer collection system.
- 2) Wastewater Pumping Station Flow Monitoring – As discussed in our meeting, there will be four wastewater pumping stations within our project. At the final, furthest downstream pumping station anticipated to be installed on Route 87, the Town of Bozrah will work with DEEP technical staff to implement cost-effective flow management measures, to regulate flows into the Franklin and Norwich systems, especially during high precipitation periods.

Potential measures discussed at this final, furthest downstream pump station are:

- a) providing variable speed pumps or smaller pumps to discharge at lower rates into the receiving sewer (especially during initial periods with low numbers of customers),
 - b) Providing a SCADA communications link with the City of Norwich treatment plant, that will allow this last pump station to either reduce flows or delay pumping during periods when the Norwich system is surcharging during heavy rainfall events, and
 - c) Providing additional wetwell volumes for potential wastewater storage, which will allow delaying the discharge into the receiving sewer to minimize impacts during surcharging conditions.
- 3) Strengthened WPCA Connection Ordinance- Bozrah already has sewer regulations for their Route 82 sewer connection to the City of Norwich. These regulations already require any sewer connections in Bozrah to meet the City of Norwich and State of Connecticut sewer regulations, which do not allow sump pump, roof leader or any extraneous sources of water other than sanitary sewage to be discharged into the sewer system. These regulations will be reviewed and upgraded is deemed necessary.

We thank the DEEP staff for their review comments and look forward to completion of the CEPA process so the Town can proceed with this important project. Please contact Selectman Bill Ballinger or me.

Respectfully submitted,
HALEY WARD, INC.


James E. Ericson, PE

Regional Manger / Vice President



Cc: Bozrah Board of Selectmen
Senator Cathy Osten.