



# STATE OF CONNECTICUT

## OFFICE OF POLICY AND MANAGEMENT

Intergovernmental Policy & Planning Division

February 16, 2024

Eric McPhee  
CT DPH, Drinking Water Section  
410 Capitol Avenue, MS #12DWS, PO Box 340308  
Hartford, CT 06134-0308

Re: Notice of Scoping for Nathan Hale System Main Extension to Plains Road, Coventry

Dear Eric,

The Office of Policy and Management (OPM) has reviewed this [scoping notice](#) and would like to provide the following comments:

- The scoping notice describes the proposed project as being a 5,015-ft extension of 6-inch water main to serve five single family residences. That length of pipe could contain 7,000 gal of water and, depending on the five households' rate of water use, it could take a week for water to pass through that length of pipe, in addition to the time required for water to reach the pipe. Does the potential accumulation of disinfection by-products or loss of residual chlorine in that length of time pose a health risk to the occupants of those homes? If so, what water quality monitoring and management protocols will be in place?
- The proposed extension traverses areas mapped as 100-year flood zone and prime or statewide important farmland soils, areas in which the extension of infrastructure that can encourage development would not be consistent with the [State C&D Plan](#). Some previous agency-funded extensions of water mains that might have induced development of agricultural and other conservation-oriented lands in a manner inconsistent with the C&D Plan incorporated service restrictions to minimize such inconsistencies and avoid the need to evaluate them with an Environmental Impact Evaluation. Is DPH considering such restrictions to minimize potential inconsistencies with the State C&D Plan?
- A [1/11/2024 Town Manager report](#) OPM found online says the water main extension was determined to be the best option for addressing the contaminated wells, referencing a report not included with the scoping notice. A [2023 presentation](#) also found on Coventry's website identifies some alternatives that apparently were considered prior to selecting the water main extension.

How do short and long-term costs vary among the various alternatives considered to respond to the contamination? The town manager report estimated the cost of the extension to be \$2.8 million, with state funding expected to cover 25-50% of that cost. DPH's online listing of community water systems says there are 40 service connections on the Nathan Hale System. Will future O&M costs for the proposed 5,015-ft extension be shared only among Nathan Hale System ratepayers or will costs be shared more broadly among other ratepayers of CT Water Co.'s Northern Region and/or the town?

- DPH must apply for a Priority Funding Area exemption for this project in accordance with [CGS Section 16a-35d](#) because much of the area to be crossed by the proposed water main

is not within a Priority Funding Area. Please feel free to contact us to discuss the process, which DPH previously followed for a water main extension in North Stonington.

The actual locations of Priority Funding Areas in that part of Coventry are misleading in the [C&D Plan Locational Guide Map & Priority Funding Areas interactive mapping](#) currently available online. The area of the proposed water main extension is mapped as being a Priority Funding Area “under map option 1 only”, but the plan was adopted with the more restrictive “Map Option 2”. The updated map must be re-uploaded but, in the interim, the [PDF version of that map](#) shows the correct extent of Priority Funding Areas.

Thank you for the opportunity to respond to this Notice of Scoping and please feel free to contact me if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Bruce Wittchen', is positioned above the typed name.

Bruce Wittchen  
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