











**Table 1**  
Summary of WLSD Regional Alternatives

Consideration	Regional Alternative T1 (Route 4)	Regional Alternative T2 (Highland Ave)	Regional Alternative T3 (Weed Road)	Regional Alternative T4 (Rte 63 to Rte 202)	Regional Alternative L1 (Litchfield Plant)
<b>Environmental Impact Overview</b>					
Air Quality & Ambient Noise	Quality and ambient noise should not change from current use.	Quality and ambient noise should not change from current use.	Quality and ambient noise should not change from current use.	Quality and ambient noise should not change from current use unless multiple pump stations needed, then an increase in noise might be expected.	Quality and ambient noise should not change from current use unless multiple pump stations needed, then an increase in noise might be expected.
Water / Effluent Quality	Level of treatment anticipated at Torrington WPCF slightly higher than Litchfield WPCF. Improved effluent discharge from present.	Level of treatment anticipated at Torrington WPCF slightly higher than Litchfield WPCF. Improved effluent discharge from present.	Level of treatment anticipated at Torrington WPCF slightly higher than Litchfield WPCF. Improved effluent discharge from present.	Level of treatment anticipated at Torrington WPCF slightly higher than Litchfield WPCF. Improved effluent discharge from present.	Level of treatment anticipated at Litchfield WPCF slightly less than Torrington WPCF. Improved effluent discharge from present.
Public Water Supply (existing and future) including Groundwater	Traverses a section of TWC watershed along Route 4 and GAA water supply area; no direct work proposed on watershed lands; redundant measures proposed to minimize risk.	Traverses GAA water supply area.	Traverses a section of TWC watershed along Route 4 and GAA water supply area; no direct work proposed on watershed lands.	Traverses GAA water supply area.	Traverses GAA water supply area.
Aquifer Protection Areas	Within GAA water supply area; traverses a section of TWC watershed; no work proposed on watershed lands.	Within GAA water supply area.	Within GAA water supply area; traverses a section of TWC watershed; no work proposed on watershed lands.	Within GAA water supply area.	Within GAA water supply area.
Floodplains	Traverses three (3) 100 year floodplain areas; localized flooding possible.	Traverses two (2) 100 year floodplain areas and crosses below a dam; localized flooding possible.	Traverses one (1) 100 year floodplain area and crosses below a dam; localized flooding possible.	Traverses nine (9) 100 year floodplain areas; localized flooding possible; multiple pump stations increase risk.	Traverses one (1) 100 year floodplain area; localized flooding possible.
Erosion	The completed project will not contribute to erosion. Erosion protection measures will be utilized during construction.	The completed project will not contribute to erosion. Erosion protection measures will be utilized during construction.	The completed project will not contribute to erosion. Erosion protection measures will be utilized during construction.	The completed project will not contribute to erosion. Erosion protection measures will be utilized during construction.	The completed project will not contribute to erosion. Erosion protection measures will be utilized during construction.

Consideration	Regional Alternative T1 (Route 4)	Regional Alternative T2 (Highland Ave)	Regional Alternative T3 (Weed Road)	Regional Alternative T4 (Rte 63 to Rte 202)	Regional Alternative L1 (Litchfield Plant)
Land Resources (Farmlands, Open Spaces, Etc)	Prime and important farmlands exist along all routes; Municipal and private open space exist along the route; no proposed direct impacts.	Prime and important farmlands exist along all routes; Private open space exists along the route; unknown impacts.	Route passes through prime and important farmlands; Route passes through municipal and private open space and protected open space; unknown impacts.	Route passes through prime and important farmlands; Route passes through municipal and private open space and protected open space; unknown impacts.	Prime and important farmlands exist along all routes; unknown impacts.
Wetlands	All routes run adjacent to wetland indicative soils; Goshen and Torrington Wetlands permits already secured.	All routes run adjacent to wetland indicative soils; Permitting in Goshen, Litchfield and Torrington not applied for.	All routes run adjacent to wetland indicative soils; Permitting in Goshen, Litchfield and Torrington not applied for.	All routes run adjacent to wetland indicative soils; permitting in Goshen and Litchfield not applied for.	All routes run adjacent to wetland indicative soils; permitting in Goshen and Litchfield not applied for.
In-Stream Flows / Wild and Scenic Rivers	No impacts to flows; no W&S Rivers present.	No impacts to flows; no W&S Rivers present.	No impacts to flows; no W&S Rivers present.	No impacts to flows; no W&S Rivers present.	No impacts to flows; no W&S Rivers present.
Coastal Zone Management and Shell Fish Impacts	Not applicable.	Not applicable.	Not applicable.	Not applicable.	Not applicable.
Endangered Species	Pump station exists in and pipe will traverse 2 NDDB areas; pipes are completely within existing roadway, no anticipated impacts.	Pump station exists in and pipe will traverse 4 NDDB areas; impacts expected to be minimal except by dam.	Pump station exists in and pipe will traverse 4 NDDB areas; impacts expected to be minimal except by dam.	Pump station exists in and pipe will traverse 4 NDDB areas; impacts expected to be minimal.	Pump station exists in and pipe will traverse 1 NDDB area; impacts expected to be minimal.
Historical & Archaeological Sites	Evaluated as part of Environmental Report; approved by the State Historic Preservation Officer February 9, 2016	Proposed to be constructed in roadways; No impacts foreseen without full review by state office.	Proposed to be constructed in roadways; No impacts foreseen without full review by state office.	Proposed to be constructed in roadways; No impacts foreseen without full review by state office.	Proposed to be constructed in roadways; No impacts foreseen without full review by state office.
Use of Pesticides or Hazardous Materials	Not applicable.	Not applicable.	Not applicable.	Not applicable.	Not applicable.
Aesthetic or Visual Affects	Pump station at existing WWTP – no impact.	Pump station at existing WWTP – no impact.	Pump station at existing WWTP – no impact.	Pump station at existing WWTP – no impact. Additional pump stations may have an aesthetic impact.	Pump station at existing WWTP – no impact. Additional pump stations may have an aesthetic impact.



Consideration	Regional Alternative T1 (Route 4)	Regional Alternative T2 (Highland Ave)	Regional Alternative T3 (Weed Road)	Regional Alternative T4 (Rte 63 to Rte 202)	Regional Alternative L1 (Litchfield Plant)
Displacement or Addition of Substantial Numbers of People	The use of a force main through areas that abut open space and no-growth areas, this alternative precludes additional growth along the route.	Increased potential for growth pressure from sewers in populated areas along the route causing additional induced growth risk.	Increased potential for growth pressure from sewers in populated areas along the route causing additional induced growth risk.	Increased potential for growth pressure from sewers in populated areas along the route causing additional induced growth risk.	The use of a force main through areas that abut open space and no-growth areas, this alternative precludes additional growth along the main in Goshen only.
Increase in Traffic or Congestion	Short-term construction traffic congestion only.	Short-term construction traffic congestion only.	Short-term construction traffic congestion only.	Short-term construction traffic congestion only.	Short-term construction traffic congestion only.
Increase in Energy Use	Energy use should decrease from existing WWTP.	Energy use should decrease from existing WWTP.	Energy use should decrease from existing WWTP.	Energy use should decrease from existing WWTP. Use could be more than other alternatives if more pumps stations needed.	Energy use should decrease from existing WWTP. Use could be more than other alternatives if more pumps stations needed.
Creation of Hazard to Human Health or Safety	Project currently in GAA aquifer and will pass through drinking water supply watershed. Existing pollution problem will be abated. Future risk to TWC reservoir is deemed minimal.	Project currently in GAA aquifer and will pass through drinking water supply watershed. Existing pollution problem will be abated. Future risk to TWC reservoir is deemed minimal.	Project currently in GAA aquifer and will pass through drinking water supply watershed. Existing pollution problem will be abated. Future risk to TWC reservoir is deemed minimal.	Project currently in GAA aquifer and will pass through drinking water supply watershed. Existing pollution problem will be abated.	Project currently in GAA aquifer and will pass through drinking water supply watershed. Existing pollution problem will be abated.
Impact to Natural, Cultural, Recreational or Scenic Resources	Project is in state roadway. No impact.	Project is in state and local roadways. Possible impact to toe of existing dam.	Project is in state and local roadways. Possible impact to toe of existing dam.	Project is in state roadway. No impact.	Project is in state and local roadway. No impact.
CT State Plan of Conservation & Development GMP 1 (redevelopment of existing infrastructure) and 5 Review (integrated planning and conservation and protection of natural resources) - as if for CWF project	Consistent with the principles and mapping. Fixing a demonstrable community pollution problem with no expansion or growth being allowed. Minimizing impact to public water supply watershed and aquifer protection areas - no impervious surface coverage being introduced.	Consistent with principles. May be inconsistent with the conservation mapping in 1 to 2 areas. The possibility for growth could make the project completely inconsistent with the Plan of Conservation and Development.	Consistent with principles. May be inconsistent with the conservation mapping in 2 to 3 areas. The possibility for growth could make the project completely inconsistent with the Plan of Conservation and Development.	Consistent with principles. May be inconsistent with the conservation mapping if not completely in the roadway. The possibility for growth could make the project completely inconsistent with the Plan of Conservation and Development.	Consistent with principles. May be inconsistent with the conservation mapping if not completely in the roadway. The possibility for growth could make the project completely inconsistent with the Plan of Conservation and Development.

Consideration	Regional Alternative T1 (Route 4)	Regional Alternative T2 (Highland Ave)	Regional Alternative T3 (Weed Road)	Regional Alternative T4 (Rte 63 to Rte 202)	Regional Alternative L1 (Litchfield Plant)
<b>Permitting</b>					
Inland Wetlands	Goshen WPCA's Water Pollution Plan approved to accommodate the proposed Project; Torrington WPCA approval pending DPH decision.	Not applied for. Would be needed from Goshen, Torrington and Litchfield.	Not applied for. Would be needed from Goshen, Torrington and Litchfield.	Not applied for. Would be needed from Goshen, Torrington and Litchfield.	Not applied for. Would be needed from Goshen, Torrington and Litchfield.
Planning & Zoning	Positive 8-24 referrals received from Goshen and Torrington. Does not pass through Torrington.	Not applied for. Would be needed from Goshen, Torrington and Litchfield.	Not applied for. Would be needed from Goshen, Torrington and Litchfield.	Not applied for. Would be needed from Goshen, Torrington and Litchfield.	Not applied for. Would be needed from Goshen, Torrington and Litchfield.
Inland Wetlands	Inland Wetlands Permits within Goshen and Torrington secured	Not applied for. Would be needed from Goshen, Torrington and Litchfield.	Not applied for. Would be needed from Goshen, Torrington and Litchfield.	Not applied for. Would be needed from Goshen, Torrington and Litchfield.	Not applied for. Would be needed from Goshen, Torrington and Litchfield.
CT DOT	CT DOT approvals pending	CT-DOT permit not applied for but would be required.	CT-DOT permit not applied for but would be required.	CT-DOT permit not applied for but would be required.	CT-DOT permit not applied for but would be required.
Dam Safety	Not needed.	Due to location relative to a dam, will need state dam safety review, may need dam safety permit.	Due to location relative to a dam, will need state dam safety review, may need dam safety permit.	Not needed.	Not needed.
Environmental Review	NEPA review completed by USDA Rural Development	CEPA and/or NEPA reviews may need to be completed based on final funding type.	CEPA and/or NEPA reviews may need to be completed based on final funding type.	CEPA and/or NEPA reviews may need to be completed based on final funding type.	CEPA and/or NEPA reviews may need to be completed based on final funding type.



Consideration	Regional Alternative T1 (Route 4)	Regional Alternative T2 (Highland Ave)	Regional Alternative T3 (Weed Road)	Regional Alternative T4 (Rte 63 to Rte 202)	Regional Alternative L1 (Litchfield Plant)
<b>Design Considerations</b>					
Downstream Receiving Sewers	Replacement of 3,500 ft of gravity sewer between end of proposed force main and City's large diameter gravity interceptor sewers.	Replacement of 6,000 ft of gravity sewer between end of proposed force main and City's large diameter gravity interceptor sewers; additional concerns with future sewer extension pressures tributary to existing receiving sewers.	Replacement of 3,500 ft of gravity sewer between end of proposed force main and City's large diameter gravity interceptor sewers; additional concerns with future sewer extension pressures tributary to existing receiving sewers.	Replacement of 21,500 ft of gravity sewer between end of proposed force main and City's large diameter gravity interceptor sewers; additional concerns with future sewer extension pressures tributary to existing receiving sewers.	Unknown replacement amount of gravity sewer; additional concerns with future sewer extension pressures tributary to existing receiving sewers.
Culvert Crossings	11 total crossings; Three main culvert crossings on Route 4; Main culvert crossing on Pie Hill Road.	7 total crossings; One culvert/dam crossing on Weed Road; geotechnical analysis not performed.	12 total crossings; One culvert/dam crossing on Weed Road; geotechnical analysis not performed.	7 total crossings; Several key culvert crossings; geotechnical analysis not performed.	Unknown – project route not driven as it is not being considered for other reasons.
Potential for Odors and Corrosion at Downstream Receiving Sewers	Moderate potential; odor control system designed.	Moderate potential.	Moderate potential.	High potential based on topography.	Moderate potential.
Rock and Ledge	Borings completed at 100-foot increments along entire route; only one rock outcropping along project route.	Borings not advanced; several rock outcroppings apparent along route with possible impact.	Borings not advanced; several rock outcroppings apparent along route with possible impact.	Borings not advanced; several rock outcroppings apparent along route with possible impact.	Borings not advanced; several rock outcroppings apparent along route with possible impact.
Status of Design and Permitting Phase	90%+ complete.	Preliminary design concept completed.	Preliminary design concept completed.	Preliminary design concept completed.	No design completed. Litchfield unable to accept the sewage.



Consideration	Regional Alternative T1 (Route 4)	Regional Alternative T2 (Highland Ave)	Regional Alternative T3 (Weed Road)	Regional Alternative T4 (Rte 63 to Rte 202)	Regional Alternative L1 (Litchfield Plant)
<b>Financial Considerations</b>					
Inter-Municipal (IMA) Agreement(s)	Required with Torrington. Torrington WPCA staff preferred pipe route; both towns prefer the lower potential for secondary/induced growth; least amount of new sewer infrastructure in City to maintain; IMA not finalized.	Required with Torrington and Litchfield.	Required with Torrington and Litchfield.	Required with Torrington and Litchfield.	Required with Litchfield.
Total Length of Pipe	34,370 LF Total	36,015 LF Total	36,140 LF Total	Involves connection to a low pressure grinder pump system. Estimate not given.	23,890 LF Total
Cost Estimate	\$15,612,000	\$20,010,000	\$18,200,000	Involves connection to a low pressure grinder pump system. Estimate not given.	\$23,909,000
Operation & Maintenance Estimate	\$590,486	\$605,486	\$600,486	Involves connection to a low pressure grinder pump system. Estimate not given.	\$797,514
Construction Loan	Fully funded by USDA-RD for a five-year term beginning April 2016.	Not committed. Funding terms uncertain.	Not committed. Funding terms uncertain.	Not committed. Funding terms uncertain.	Not committed. Funding terms uncertain.
Long Term Financing	Fully funded by USDA-RD for a five-year term beginning April 2016; Maximum 40-year interest rate guaranteed.	Not committed. Financing terms uncertain.	Not committed. Financing terms uncertain.	Not committed. Financing terms uncertain.	Not committed. Financing terms uncertain.
Taxpayer Appropriation	Approved by voters in Spring 2016.	Approval of additional funds by voters uncertain.	Approval of additional funds by voters uncertain.	Approval of additional funds by voters uncertain.	Approval of additional funds by voters uncertain.
Socio-Economic Impacts	Lowest cost to residents.	Moderate cost to residents.	Higher cost to residents.	Highest cost to residents.	Not considered for other reasons.

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH



Raul Pino, M.D., M.P.H.  
Commissioner

Dannel P. Malloy  
Governor  
Nancy Wyman  
Lt. Governor

### Drinking Water Section

March 9, 2017

#### VIA FIRST CLASS MAIL

Ms. Denise Ruzicka  
Director  
Water Planning and Standards Division  
Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127

RE: Woodridge Lake Sewer District's Proposed Regional Sewer Connection Project

Dear Ms. Ruzicka:

Thank you for taking the time to speak with me yesterday regarding Woodridge Lake Sewer District's ("WLSD") proposed regional sewer connection project ("Proposed Project"). As you know, as part of its *Conn. Gen. Stat.* § 25-34<sup>1</sup> investigation, the Department of Public Health ("Department") is reaching out to people and entities that may have information relevant to the Department's investigation. As we discussed, the Department requests that DEEP provide to it a technical analysis of each of the five alternatives, which are the Local Alternative<sup>2</sup> and Regional Alternatives T1<sup>3</sup>, T2<sup>4</sup>, T3<sup>5</sup>, and L1<sup>6</sup>, that

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<sup>1</sup> *Conn. Gen. Stat.* § 25-34 states that: "(a) The Department of Public Health may, and upon complaint shall, investigate any system of water supply or source of water or ice supply from which water or ice used by the public is obtained, and, if it finds any pollution or threatened pollution which in its judgment is prejudicial to public health, it shall notify the owner or operator of such water company or system of ice supply, or the person or corporation causing or permitting such pollution or threatened pollution, and the Commissioner of Energy and Environmental Protection, of its findings and shall make such orders as it deems necessary to protect such water or ice supply and render such water or ice safe for domestic use. (b) A copy of any such order shall be mailed to such owner or operator or such person or corporation by certified mail, return receipt requested. Within thirty days of the date of mailing, the recipient of the order may request a hearing to show why the findings in the order are not based on substantial evidence or that the order is an abuse of discretion. Upon receipt of such request, the commissioner shall grant a hearing as soon thereafter as practicable or within ten business days if the order requires immediate compliance. The commissioner shall not grant any request for a hearing at any time thereafter. The order shall be effective on a date set by the commissioner, but the recipient of the order may request a stay of such order pending the decision of the commissioner. Any hearing shall be deemed to be a contested case and held in accordance with the provisions of chapter 54. The request for a hearing shall be a condition precedent to an appeal under the provisions of section 25-36."

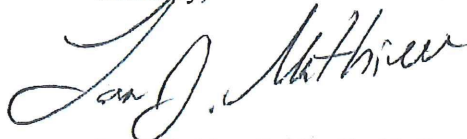
<sup>2</sup> The Local Alternative would replace WLSD's existing water pollution control facility (hereinafter "WPCF") at its current location on Brush Hill Road in Goshen with a new WPCF.



WLS D evaluated to resolve its sanitary sewer collection and wastewater treatment and disposal needs. If DEEP has any other information that may be relevant to the Department's *Conn. Gen. Stat.* § 24-34 investigation, the Department requests that DEEP provide that information as well. The Department requests that DEEP provide the technical analysis, as well as any other relevant information it may have, to the Department by March 24, 2017.

If you have any questions, please do not hesitate to contact me at (860) 509-7333.

Sincerely,



Lori Mathieu, Public Health Section  
Chief, Drinking Water Section

cc: Yvonne T. Addo, MBA, Deputy Commissioner, DPH ([yvonne.addo@ct.gov](mailto:yvonne.addo@ct.gov))  
Lori Mathieu, Public Health Section Chief, Drinking Water Section, DPH ([lori.mathieu@ct.gov](mailto:lori.mathieu@ct.gov))  
Antony A. Casagrande, Esquire, General Counsel, DPH ([antony.casagrande@ct.gov](mailto:antony.casagrande@ct.gov))  
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Ms. Susan Suhanovsky, President, Torrington Water Company  
([s.suhanovsky@torringtonwater.com](mailto:s.suhanovsky@torringtonwater.com))  
Ms. Betsey Wingfield, Bureau Chief, Bureau of Water Protection and Land Reuse, DEEP  
([betsey.wingfield@ct.gov](mailto:betsey.wingfield@ct.gov))  
Hon. Elinor Carbone, Mayor, City of Torrington ([elinor\\_carbone@torringtonct.org](mailto:elinor_carbone@torringtonct.org))  
Mr. Jay Bate, Jr., Chairman, Inland Wetland Commission, City of Torrington  
Ms. Rista Malanca, Zoning and Wetlands Enforcement Officer, City of Torrington  
([rista\\_malanca@torringtonct.org](mailto:rista_malanca@torringtonct.org))  
Mr. Thomas R. Stansfield, Chairman, Inland Wetland and Water Courses Commission, Town of  
Goshen  
Ms. Stacey Sefcik, Land Use Commissions Clerk, Town of Goshen ([ssefcik@goshenct.gov](mailto:ssefcik@goshenct.gov))  
Mr. Johan Strandson, Area Director, USDA Norwich Service Center ([johan.strandson@ct.usda.gov](mailto:johan.strandson@ct.usda.gov))  
Mr. David LeVasseur, Office of Policy and Management ([david.levasseur@ct.gov](mailto:david.levasseur@ct.gov))  
Connecticut Water Planning Council ([wpc@ct.gov](mailto:wpc@ct.gov))  
Torrington Area Health District

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<sup>3</sup> Regional Alternative T1, which is WLS D's Proposed Project, would route a force main along Brush Hill Road, Old Middle Street (Route 63), Pie Hill Road, East Street South and Torrington Road (Route 4), with interconnection to the Torrington sewer system near the intersection of Lover's Lane and Goshen Road (Route 4).

<sup>4</sup> Regional Alternative T2 would route a force main along Brush Hill Road, Old Middle Street (Route 63), through Litchfield along Deming Road, to Weed Road and Highland Avenue, with the interconnection to the Torrington sewer system west of Birney Brook Road.

<sup>5</sup> Regional Alternative T3 would route a force main along Brush Hill Road, Old Middle Street (Route 63), along Deming Road through Litchfield, to Weed Road and then to Goshen Road (Route 4), with interconnection to the Torrington sewer system at Lover's Lane and Goshen Road (Route 4).

<sup>6</sup> Regional Alternative L1 would route a force main south from the WLS D plant pump station along Town Hill Road to the Litchfield town line and then along Beach Street and Constitution Way in Litchfield, where it would connect to the existing Litchfield sewer system at the intersection of Constitution Way and Whites Wood Road.



January 27, 2017

Lori Mathieu, Public Health Section Chief  
CT Department of Public Health  
Drinking Water Section  
410 Capitol Avenue  
MS#51-WAT  
PO Box 340308  
Hartford, CT 06134

RE: Woodridge Lake Sewer District's Proposed Regional Sewer Connection Project

Dear Ms. Mathieu:

Thank you for the opportunity to provide comments and additional information to the Department of Public Health regarding the Woodridge Lake Sewer District's ("WLSD") proposed regional sewer connection project ('proposed project'). We offer the following information in addition to what has been previously submitted (see attached letter dated November 18, 2016.)

The overall land and water area affected by the many components of this issue is complex. It is important to note that all involved watersheds are classified as Class AA watersheds, which need to be protected as water resources, and include the following:

- The Shepaug Reservoir's Class AA public water supply watershed, which is where the Woodridge Lake Sewer District (WLSD) is located.
- The Bantam River Class AA watershed, which is tributary to Bantam Lake, a major recreational waterbody and which currently contains the WLSD treatment plant. The existing facility is a subsurface ridge and furrow system that is failing and allowing pollution to enter the waters of the state. The Bantam River watershed also contains the Aquarion Aquifer Protection area associated with the Goshen wellfield.
- The Torrington Water Company's Allen Dam watershed area.

As you are aware, the project is located entirely within the state DOT roadway (paved area) as it passes through a short length of the Allen Dam subwatershed. No water company owned lands are being disturbed. We will summarize why we believe that this project does not present or cause pollution or threaten pollution of a public water supply source which is prejudicial to public health. The very minimal risk of this project is outweighed by solving an existing ongoing environmental pollution problem, which has undergone a thorough alternatives analysis including the federal NEPA process.



The WLSO existing failing system needs an immediate remedy after decades of discussion and analysis. The most appropriate way to address this community pollution problem is to redirect this flow to proper treatment with discharge to a class B waterbody. The City of Torrington Wastewater Facility which discharges into the Naugatuck River, a class B stream, is the appropriate receptor for this flow. Any proposed route from WLSO to the City of Torrington Wastewater Facility would pass through some or all of these Class AA watersheds. WLSO's proposed route offers the least disturbance with minimal impacts.

We would like to point out that CT State Route 4 is an existing DOT owned road that travels through a portion of the Torrington Water Company (TWC) watershed. According to the Connecticut Department of Transportation Traffic Count Data<sup>1</sup>, the average daily count for vehicles ranges from 6,500 to 7,000 in the watershed along Route 4 (Goshen Road). At 6,500 vehicles per day, there are potentially 1,690,000 vehicles during the year on work days alone. Many of those vehicles will be trucks carrying gasoline, diesel and home heating oil, which pose a significant potential source of pollution to the Allen Dam subwatershed.

Whereas the risk of a force main leak associated with the small section of the proposed project crossing the Allen Brook subwatershed within CT Route 4 is minimal, Torrington Water Company has an emergency response plan in place to respond to any spills in the Allen Dam subwatershed and the WLSO is proposing protective controls and measures to decrease any potential for a spill. In addition, the September 20, 2016 Meeting Minutes from the City of Torrington Inland Wetlands Committee when reviewing this project states on page 6, "Ms. Malanca referred to TWC's Engineer's Report, from Tata and Howard, page 7 which says "A rough estimate of travel time to the Allen Reservoir dam based on textbook soil transmissivity values was made and found to be in the range of 6 months to a year based on generally published soil data for the area. It is therefore likely that leakage from the project would not be readily noticed in the Allen Reservoir." And on Page 7 of the same minutes "The Commission finds that there is no reasonable likelihood of adverse impact to the wetlands and watercourses from the regulated activities proposed."

WLSO's *Application for Inland Wetlands Permit for the City of Torrington* dated July 13, 2016, includes plans specifically showing that any NEW pipe will be completely within the existing DOT roadway. No watershed or water company lands will be impacted. The plans also show that approximately 3,400 feet of existing City of Torrington Water Pollution Control Authority (WPCA) sewer (including some within the watershed) that is outdated is being replaced. This will increase reliability of the pipe, appropriately size pipe for the existing flow including WLSO, and limit the risk for potential pollution; thereby increasing protection of the watershed.

This project was also designed with due consideration of potential impacts to the City of Torrington WPCA collection system. The alternate route (not preferred) increases the probability of odor issues and clogging due to the addition of the flows at a point requiring the sewerage to flow a longer meandering distance through the City of Torrington sewer system in undersized sewer pipe before getting to the Torrington wastewater treatment plant. Whereas the recommended route brings the sewerage as directly as possible into the soon to be upgraded Torrington wastewater treatment plant through appropriately sized and sloped pipe.

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<sup>1</sup>Traffic Monitoring Information Traffic Count data is located on the Department of Transportation's webpage at: <http://www.ct.gov/dot/cwp/view.asp?a=3532&q=330402>.



We respectfully ask that due consideration be given to the need to resolve an existing pollution problem in an effective and efficient manner.

To reiterate the important points previously made:

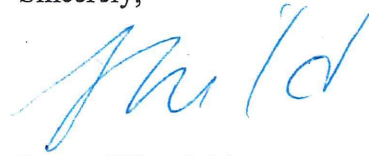
- The WLSD's existing treatment plant's ridge and furrow system is failing and allowing pollution to enter the waters of the State in a class AA watershed. This existing failing system needs an immediate remedy after decades of discussion and analysis.
- No growth is being introduced either in Goshen or Torrington.
- The maximum build out in Goshen is already planned for and no additional connections can be made along the force main in Torrington as required by the City of Torrington.
- No water company owned lands are being disturbed as the force main will be entirely within the existing DOT roadway.
- The chance of a leak is minimal, but WLSD has already stated they will include additional safety measures to provide redundancy at the most sensitive crossing closest to the Allen Dam.
- Existing sewer pipe within the Allen Dam subwatershed is being replaced with pipe that has tighter joints thereby decreasing the risk of a leak in the existing sewer main. This improvement as a result of the proposed project results in a reduction of risk and improved protection of the Torrington Water Company source.
- The chosen sewer main route to the City of Torrington wastewater treatment plant will avoid creating other potential public health issues such as overflows, clogging or odors within the existing City of Torrington sewer collection system. The preferred route has the wastewater from WLSD entering directly into a twelve inch interceptor sewer not available in the alternate route.
- The WLSD sewer line segment in question and the associated pump station will be operated by the City of Torrington WPCA which has extensive experience operating such systems and has a vested interest in protecting the water sources serving the City of Torrington.

Lastly, this sewer system is not different from those that currently exist in many other towns and watersheds across the state. Inter-municipal cooperation and regional solutions are increasingly needed to solve important water quality and water pollution problems which impact public health associated with human recreational use of Connecticut's lakes streams and rivers. Public drinking water surface watersheds are located in 93 municipalities in the state of Connecticut. Of the 214 public drinking water surface watersheds in Connecticut, 130 have sewer service area parcels within them. Thus, there is a wide spread distribution of municipal sewer systems within numerous drinking watersheds in Connecticut. The mere presence of sewer systems within drinking water watersheds has not been demonstrated to present or cause pollution or threaten pollution of a public water supply source which is prejudicial to public health.

In the unfortunate circumstance that your Department intends to determine otherwise, we respectfully request a high level interagency meeting be held prior to such determination so that the merits of the multi-faceted environmental and public health issues can be mutually understood by both agencies.

Please contact Denise Ruzicka of my staff if you need further information on any aspect of this letter at (860) 424-3853 or by email at [denise.ruzicka@ct.gov](mailto:denise.ruzicka@ct.gov).

Sincerely,



Betsey Wingfield  
Bureau Chief  
Bureau of Water Protection and Land Reuse

cc: Johan Strandson, USDA-RD (via e-mail)  
Ray Turri, President, WLSD (via e-mail)  
Oswald Inglese, DEEP (via e-mail)

Attachments:

Letter dated December 22, 2016 from Lori Mathieu requesting DEEP comments  
Letter dated November 18, 2016 from Betsey Wingfield to DPH

# STATE OF CONNECTICUT

## DEPARTMENT OF PUBLIC HEALTH



Raul Pino, M.D., M.P.H.  
Commissioner

Dannel P. Malloy  
Governor  
Nancy Wyman  
Lt. Governor

### Drinking Water Section

December 22, 2016

Ms. Betsey Wingfield  
Bureau Chief  
Bureau of Water Protection and Land Reuse  
Department of Energy and Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127

RE: Woodridge Lake Sewer District's Proposed Regional Sewer Connection Project

Dear Ms. Wingfield:

This is in response to your November 18, 2016 letter regarding Woodridge Lake Sewer District's ("WLSD") proposed regional sewer connection project ("Proposed Project"). The Proposed Project would route a force sewer main directly through Torrington Water Company's ("TWC") Allen Dam Reservoir watershed area.

In written testimony submitted to both the Goshen Inland Wetlands and Water Courses Commission and the Torrington Inland Wetland Commission pursuant to *Conn. Gen. Stat. § 25-32f*, the Department of Public Health ("Department") raised concerns with the route of such Proposed Project and the potential impacts a failure of the force main would have on the Allen Dam Reservoir, which supplies water to 40,000 people in the Torrington area. In the Department's written testimony, it requested that WLSD consider alternative routes that would avoid a public drinking water supply watershed. WLSD did subsequently modify the Proposed Project by including additional protective measures in response to concerns raised by the Department. To date, however, WLSD has not changed the route of such Proposed Project.

As you know, pursuant to *Conn. Gen. Stat. § 25-34*,<sup>1</sup> the Department has instituted an investigation to determine whether WLSD's Proposed Project may cause the pollution or threatened pollution of a

<sup>1</sup> *Conn. Gen. Stat. § 25-34* states that: "(a) The Department of Public Health may, and upon complaint shall, investigate any system of water supply or source of water or ice supply from which water or ice used by the public is obtained, and, if it finds any pollution or threatened pollution which in its judgment is prejudicial to public health, it shall notify the owner or operator of such water company or system of ice supply, or the person or corporation causing or permitting such pollution or threatened pollution, and the Commissioner of Energy and Environmental Protection, of its findings and shall make such orders as it deems necessary to protect such water or ice supply and render such water or ice safe for domestic use. (b) A copy of any such order shall be mailed to such owner or operator or such person or corporation by certified mail, return receipt requested. Within thirty days of the date of mailing, the recipient of the order may request a hearing to show why the findings in the order are not based on



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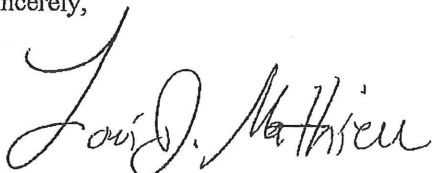
Ms. Wingfield  
December 22, 2016  
Page 2

source of public drinking water supply. As part of its investigation, the Department is reaching out to people and entities that may have information relevant to the Department's investigation. If the Department of Energy and Environmental Protection ("DEEP"), or anyone else, has any information, please submit it to the Department.

If, after the investigation, the Department finds that WLSD's Proposed Project will cause the pollution or threatened pollution of a source of public drinking water supply that in the Department's judgment is prejudicial to public health, the Department may issue an order or orders in writing to WLSD that the Department deems necessary to protect the source of public drinking water supply and render such water safe for domestic use. If the Department issues an order or orders to WLSD, WLSD will have an opportunity to request a hearing to show why the findings in the order or orders are not based on substantial evidence or that the order or orders are an abuse of discretion.

Thank you for writing to the Department. We appreciate any and all additional information that you can share with us.

Sincerely,



Lori J. Mathieu  
Public Health Section Chief  
Drinking Water Section

Cc: Susan Suhanovsky, Torrington Water Company  
Johan Strandson, USDA RD  
Raymond Turri, Woodridge Lake Sewer District  
Denise Ruzicka, Oswald Inglese, DEEP

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substantial evidence or that the order is an abuse of discretion. Upon receipt of such request, the commissioner shall grant a hearing as soon thereafter as practicable or within ten business days if the order requires immediate compliance. The commissioner shall not grant any request for a hearing at any time thereafter. The order shall be effective on a date set by the commissioner, but the recipient of the order may request a stay of such order pending the decision of the commissioner. Any hearing shall be deemed to be a contested case and held in accordance with the provisions of chapter 54. The request for a hearing shall be a condition precedent to an appeal under the provisions of section 25-36."



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November 18, 2016

Lori Mathieu, Public Health Section Chief  
CT Department of Public Health  
Drinking Water Section  
410 Capitol Avenue  
MS#51-WAT  
PO Box 340308  
Hartford, CT 06134-0308

RE: Woodridge Lake Sewer District's Proposed Regional Sewer Connection Project

Dear Ms. Mathieu:

Inadequate treatment and dispersal of sewage from the residential community of Woodridge Lake has been a long standing threat to water quality in Connecticut. In 1989 the Department of Energy and Environmental Protection ("DEEP") entered into a consent order requiring, among other things, Woodridge Lake Sewer District ("WLSD") to investigate the hydraulic capacity of the ridge and furrow dispersal system. After a series of engineering reports that DEEP found inadequate, a comprehensive report in 1995 demonstrated to the DEEP that the WLSD infiltration site located off Brush Hill Road in Goshen was not a viable long term wastewater dispersal option for the treated wastewater from the community. The ridge and furrow dispersal site lacks sufficient hydraulic capacity for current and future peak wastewater flows. When the hydraulic capacity of the dispersal system is exceeded it creates overland flow and a point source discharge to surface waters of the West Branch Bantam River, which is classified as Class AA waters.

To address the above issue, WLSD hired Woodard and Curran to perform wastewater facilities planning. The report completed by Woodard & Curran concluded that the transmission of WLSD wastewater along Route 63 and Route 4 to Torrington's collection system for subsequent wastewater treatment and disposal is the most practical solution to the existing community pollution problem. DEEP concurred with this assessment.

What makes this community pollution problem unique is the size of the taxing district and its location. The community wastewater service area is located within the Shepaug Reservoir Class AA watershed. The current disposal system is located in an adjacent Class AA watershed (Class AA watersheds are existing or potential drinking water supply areas). There are no nearby subsurface treatment options available. In addition, the fiscal burden for any solution will be shouldered by less than 900 property owners. The chosen solution must not only be viable, but also economically practical for WLSD. The recommended route is the most cost-effective solution.







