

ISSUE SUMMARY

As you are aware, the Metropolitan District (MDC) is in the midst of an approximately \$2.4B capital improvement project designed to upgrade the region's sanitary sewer system and minimize, if not eliminate, combined sewer overflows and sanitary sewer overflows that impact our residents, businesses and those us who enjoy the recreational and aesthetic benefits of the Connecticut River and Long Island Sound. The project is the product of a federal consent decree and state consent order, and its components are set forth in a DEEP approved document known as the "Long Term Control Plan" (LTCP). The LTCP was initially developed in 2007, and is subject to review and modification every five (5) years thereafter. For example, the 2007 plan called for extensive combined sewer separation projects throughout the City of Hartford. Unfortunately, as separation projects were completed and evaluated for their effectiveness, a determination was made that the more effective and less costly solution to the combined sewer overflows was the construction of one or more large capacity, deep rock tunnels. The 2012 revisions to the LTCP included a shift from sewer separation to the use of tunnels to accept, convey and store combined sanitary and storm water discharges and treat these discharges at expanded water pollution control facilities.

With the approval of the 2012 LTCP by DEEP, the MDC began design work on one of the two anticipated tunnels. Work on the South Hartford Storage and Conveyance Tunnel located along the southern part of Hartford and extending into West Hartford is presently underway.

The next submission to DEEP of the LTCP is due on or before December 31, 2017. As with the original LTCP, LTCP updates require the measurement of the effectiveness from previous system improvements, and incorporation of these findings into a recalibrated hydraulic model. This is particularly critical at this state of the project as the north tunnel, designed largely to eliminate combined sewer flows into the North Branch of the Park River (NBPR) in the northwest corner of Hartford, calls for a huge investment of state, MDC, MDC ratepayers and taxpayer funds, estimated at this point to be upwards of \$600M.

Although the expected benefits of these projects, including the north tunnel, were estimated in previous planning documents, the MDC has initiated an extensive system-wide flow monitoring program to document in detail the actual benefits of the recent improvements and the system's current performance characteristics. The program was initiated in March of 2016 and includes installation of over 100 flow meters at locations with the interceptors, regulating structures and several of the larger CSO outfalls. Utilizing the data collected through this metering program, the type, location and/or size of CSO controls needed to meet the objectives of the Consent Order may change.

In addition, the MDC initiated a sampling program and investigation into the water quality characteristics of the NBPR. Based upon the analysis of the data accumulated to date, it appears that the source of pollutants into the NBPR is not, to any significant degree, the combined sewer overflows from the MDC system that the north tunnel was intended to eliminate; rather, the primary source originates in areas upstream from the MDC overflow points. Given the estimated cost of the north tunnel, this preliminary analysis has prompted the MDC to re-evaluate whether the north tunnel is the most effective, financially prudent alternative to improving the NBPR and its surrounding ecosystem.

At its meeting of January 9, 2017, the MDC Board of Commissioners were advised of the foregoing, and directed its CEO, Scott W. Jellison, to apprise DEEP of these findings and invite DEEP to an open, forthright discussion of the issues presented. There may be a more effective way to achieve the results called for by the consent order and decree than investing in an over one-half billion dollar tunnel that merely addresses a minor contribution to the problem.

A copy of Mr. Jellison's letter to DEEP and the Power Point presentation considered by the MDC Board is available at <http://themdc.org/news-events/clean-water-project-north-tunnel-update> . We will keep you advised as this matter moves forward.