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The Environmental Protection Agency (EPA) Notice: **Draft EPA Climate Change Adaptation Implementation Plans: Availability**

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Robert Scully's comments on the 9/18/13 Draft EPA New England Regional Climate Adaption Plan

Decentralized sewage systems (A.K.A., Septic Systems) serve approximately 40% of CT's population, and they are the predominate means for sewage treatment and disposal in six coastal communities on CT's shoreline. There has been significant damage to many decentralized sewage systems in recent years from major storms that impacted New England's shoreline. Many impacts (storm surge, flooding, rising sea level) from climate change have the potential to adversely impact decentralized sewage systems in coastal areas, and page 23 of the draft 9/18/13 EPA Region 2 Climate Change Adaption

Plan includes a brief discussion of the potential adverse impacts that climate change may have on septic systems. The New England plan includes no such discussion, or for that matter, any mention of septic systems in the 67 page document.

I recommend the draft document be revised to include a discussion about the impacts of climate change on decentralized sewage systems, and a discussion on the benefits of decentralized sewage system (DSS) management to help deal with climate change matters. Improved DSS management in accordance with EPA's Voluntary Guidelines would help ensure climate change impacts are addressed in a proactive, pollution prevention manner.

CT's Climate Change Preparedness Plan includes several comments on page 97 for a few of the climate change considerations for on-site (subsurface disposal) systems.

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