



STATE OF CONNECTICUT
OFFICE OF POLICY AND MANAGEMENT
Division of Transportation, Conservation, and Development Policy and Planning

December 7, 2017

Ann A. Straut
DEEP Bureau of Water Protection and Land Reuse, Water Planning and Management Division
79 Elm Street, Hartford CT 06106-5127

Re: Notice of Scoping for Wastewater Facilities Plan for the Town of Fairfield

Dear Ann:

The Office of Policy and Management (OPM) has reviewed the Notice of Scoping for Fairfield's Wastewater Facilities Plan and submits the following comment:

- In describing the facility study completed in producing the wastewater facilities plan, the Scoping Notice says:

The study evaluated alternatives for providing improvements to the existing WPCF to meet the long-term needs of the town. The evaluation considered current regulatory requirements, the age and condition of the existing equipment, the capacity of existing unit processes to meet projected flows and loads, and process reliability.

State agencies that undertake certain activities outlined in CGS Section 16a-31 must determine that their proposed action is consistent with the state's [Plan of Conservation & Development](#) (POCD). For example, the POCD's Growth Management Principle #5 (GMP 5) requires an agency to "Proactively address climate change adaptation strategies to manage the public health and safety risks associated with the potential increased frequency and/or severity of flooding..." This is especially relevant for a coastal wastewater facility.

GMP 5 goes on to reference the [Connecticut Climate Change Preparedness Plan](#) (CCCPP) as a resource to further inform the sponsoring agency's planning efforts. The CCCPP identifies adaptation strategies for coastal infrastructure that may be vulnerable to the effects of storm surge and sea level rise, including the following on page 45:

Timing, phasing and/or scheduling of adaptive actions should be determined by the level of urgency or imminent threat situations that require immediate action to protect infrastructure and public health and safety. This evaluation should also consider long-term planning factors such as obsolescence of infrastructure or life-cycle replacement cost and variance in climate change pressures that would modify design standards, location, etc. This might be done in an actuarial framework that takes advantage of insurance based economic and property value assessments in relation to the costs of adaptation, especially

with respect to engineering solutions such as armoring or reconstruction (Economics of Climate Adaptation Working Group 2009).

Has there been or will there be any consideration of treatment facility relocation options? The following statements on pg 96 of the CCCPP add to the expectation for the state to take a pro-active approach:

Investigate protection strategies (e.g., berms, dikes) to protect treatment infrastructure after consideration of non-structural, less hardening alternatives and/or or relocation of infrastructure subject to sea level rise and inland flooding

Review FEMA's current policies that do not allow for relocation and work to modify policies

Please describe DEEP's approach for considering the long-term viability of coastal WPCFs, especially regarding the potential for incorporating complete or partial facility relocation during major upgrades. To be consistent with the CCCPP and, by extension, the expectations of the POCD and of the public, this should be a routine component of such a scoping notice.

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:



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