

January 2, 2018

Bruce Wittchen
Office of Policy and Management
450 Capitol Avenue
MS# 54ORG
Hartford, CT 06106

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

Dear Bruce:

Thank you for your scoping comments of December 7, 2017 regarding the Fairfield Wastewater Treatment Facilities Plan. In your comments, you asked “Has there been or will there be any consideration of treatment plant relocation options?” You also wrote, “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.”

As you may be aware, a municipal sewage wastewater treatment facility is usually the most expensive asset a municipality owns. The cost to move such a facility would be prohibitive to the town or the State. The State has made significant investments in these facilities and, considering the prohibitive cost of relocating WPCFs, DEEP strives to ensure that facility investments and improvements are responsive to sea level rise by incorporating the most current *New England Interstate Water Pollution Control Commission TR-16 Guides for the Design of Wastewater Treatment Works* requirements into our reviews, which include flood protection and sea level rise criteria. While ideally it would be desirable to locate this infrastructure in more protected inland locations, WPCFs must be at or very close to the lowest elevation in the service area they serve. For coastal communities, this means such facilities will almost always be found near the shoreline.

The need to protect the Fairfield WPCF has been recognized by the town which has secured 75% funding through the CT Department of Housing (DOH) Community Development Block Grant – Disaster Recovery (CDBG-DR) program with a local 25% town share to build a protective berm around the facility to protect it from future flooding and sea level rise. The plans for this \$2,316,000 project were completed approximately 6 months ago and submitted to various parts of DEEP for review and approval. The Town of Fairfield intends to advertise and bid the project in spring 2018 and start construction shortly afterwards. For more information on the berm, please contact Joseph Michelangelo, Director of Public Works for the Town of Fairfield at (203) 256-3010 or jmichelangelo@fairfieldct.org. For more information on the CT DOH CDBG-DR program, please contact John Rosenthal of that agency at (860) 270-8173 or john.rosenthal@ct.gov.

We believe this information should address your concerns concerning the Town of Fairfield WPCF. As to your more general question concerning all WPCFs in coastal communities, both the municipalities and DEEP, as a matter of practice, evaluate the degree of vulnerability of these facilities and alternatives for protecting them from sea level rise and coastal storm damage whenever significant new investments are proposed to be made for such facilities. The option of relocating the facilities would seldom if ever be practical, but would be considered in the case of regionalization, or if an existing facility needed complete or near complete replacement. If such a case were to arise, DEEP would require evaluation of all potential protection strategies and their associated costs and benefits as well as the overall environmental benefits and impacts of the new facility.

Thank you again for your comments concerning this scoping notice.

Sincerely,



Denise Ruzicka
Director
Water Planning and Management Division
Bureau of Water Protection and Land Reuse

cc: Robert Kaliszewski, Deputy Commissioner, DEEP (via email)