CITY OF GROTON / FORM B / COASTAL AREA MANAGEMENT

a. Coastal Resources Narrative

Provide a narrative describing all coastal resources as defined in C.G.S. Section 22a-93 with an accompanying site plan depicting the location of all resources.

The intent of this project is to relocate sodium hypochlorite tanks from inside the main building housing the existing Water Pollution Control Facility (WPCF) to a pad directly adjacent to the northerly exterior of the building as shown on the plans. This will involve a relocation of an exterior above-ground fuel tank (1,000 gallon capacity) from the north side of the building to the west side of the structure, again directly adjacent to the building. It is anticipated, as further explained below, that the fuel tank will eventually be eliminated and removed from the site. None of the proposed work is in or near tidal wetlands and / or waterward of the high tide line.

The coastal resources enumerated in C.G.S. Section 22a-93 include: (A) Coastal bluffs and escarpments; (B) rocky shorefronts; (C) beaches and dunes; (D) intertidal flats; (E) tidal wetlands; (G) estuarine embayments; (H) coastal hazard areas; (I) developed shorefront; (J) islands; (K) nearshore waters; (L) offshore waters; (M) shorelands; and (N) shellfish concentration areas.

Of these resources, the three that apply are (H) coastal hazard areas, (I) developed shorefront, and (M) shorelands:

> (H) Coastal Hazards - With respect to this item, the sewage treatment plant is fully situated within a 100-year flood zone and has been since its original construction. All vital facilities are, however, situated above the 100-year flood elevation of 11 ft. The top of the base slab for the new sodium hypochlorite tanks is to be set at Elev. 11.5 ft., as will be the base of the temporarily relocated fuel tank.
>
> (I) The Water Pollution Control Facility has been and continues to be situated in a highly developed industrial and commercial shoreline / shorefront area. Its purpose is obviously to treat wastewater from these and other City areas in order to maintain a clean coastal marine environment. The relocation of the sodium hypochlorite tanks is intended to improve the treatment process and will not significantly change the current site layout.
>
> (M) The WPCF is situated directly along the shorelands adjacent to the east side of the Thames River, where tidal ebb and flow occurs. The proposed work does not, however, impact any direct shoreline areas. All work will be concentrated in a small landward area directly adjacent to the north side of the existing facility, an area which is currently occupied by a small fuel storage tank. The fuel tank, which is to be

relocated temporarily, as previously mentioned, is expected to be completely removed from the site when the current HVAC Systems is switched over to an electric heat pump, likely eliminating the need for a fuel storage tank.

b. Assessment of Project Suitability: Capability of Resources to Accommodate the Proposed Use

1. Identify any and all coastal resource policies applicable to the proposed project as identified in C.G.S. Section 22a-92 (b) (2) and the *CT Coastal Management Manual*.

Of the policies identified in C.G.S. Section 22a-92 (b) (2) and the CT Coastal Management Manual, only the following appears to apply:

(G) "*Promote, through existing state and local planning, development, promotional and regulatory programs, the use of existing developed shorefront areas for marine-related uses*". Through the proposed improvements to the WPCF, including in this case the relocation of the sodium hypochlorite tanks from inside the main building housing the existing WPCF to a pad directly adjacent to the northerly exterior of the building, as shown on the plans, the City of Groton Water Pollution Control Authority (WPCA) seeks greater protection and efficiencies to the existing system. Because of age and deficiencies, the existing tanks in the basement of the main building will be removed and new tanks will be installed at the outside area noted, providing greater access, additional space and improved safety within the basement of the main building. Overall, this will provide better treatment and a cleaner marine environment at the effluent discharge point in the Thames River.

2. Identify any and all coastal use policies applicable to the proposed project as identified in C.G.S. Section 22a-92 (b) (1) and the *CT Coastal Management Manual*.

Of the policies identified in C.G.S. Section 22a-92 (b) (1) and the CT Coastal Management Manual, only the following appears to apply:

(D) *"To require that structures in tidal wetlands and coastal waters be designed, constructed and maintained to minimize adverse impacts on coastal resources, circulation and sedimentation patterns, water quality, and flooding and erosion, to reduce to the maximum extent practicable the use of fill, and to reduce conflicts with the riparian rights of adjacent landowners"*. For the protection from and minimization of impacts due to the relocation of the sodium hypochlorite (NaClO) tanks, the tanks are to be double walled and the piping leading to the building will, likewise, be double containment pipe, both equipped with leak detection sensors situated within annular spaces between tank and pipe walls. The leak detection sensors will be tied into the Plant's alarm system, which is accessible to plant personnel on a 24-hour basis.

3. Describe how the proposed project is consistent with all of the coastal policies identified above (i.e., describe the extent to which the project complies or conflicts with each policy). Note: If a project conflicts with any policy, the project should be modified to reduce or eliminate the conflict.

The proposed work is designed to upgrade and thereby improve the existing facilities, which in turn will maintain and enhance treatment of wastewater for the betterment of the marine environment along this highly developed shoreline.

c. Potential Beneficial and Adverse Impacts and Methods of Mitigation

1. Identify and describe the potential adverse impacts (as defined C.G.S. Section 22a-93 (15)) and potential beneficial impacts of the project on coastal resources.

The proposed upgrades are designed to improve the quality of wastewater effluent. Thus, no degradation of coastal resources is anticipated. In fact the project will have a beneficial impact for the marine environment.

2. Is the project a water dependent use as defined in C.G.S. Section 22a-93 (16)? If so, explain why.

The WPCF, while not a water dependent use in the sense that it requires sea or tidal waters for treatment, is dependent on discharging its final treated effluent into adjacent tidal waters. The current project will not change this pattern or increase any flow. It is being done, as previously stated, to improve the treatment process for better quality effluent to discharge into the adjacent river.

3. Describe the impacts or effects (either positive or negative) that the project will have on future water dependent uses or development on, and adjacent to this site. (Adverse impacts on future water dependent development opportunities are described in C.G.S. Section 22a-93 (17)).

This section addresses alternatives not relevant to the proposed project. The WPCF has been in existence in its current footprint for many decades and is not expected to change its layout in the near future.

4. Describe the proposed measures to mitigate (reduce or eliminate) any adverse impacts on coastal resources described in c.1 and, if applicable, on future water dependent development opportunities described in c.3.

As noted above, no adverse environmental impacts are anticipated from the proposed project, nor will it impact future water dependent development opportunities, as there is no change to the site other than an upgrade of treatment processes.

d. Demonstration of the Acceptability of Remaining or Unmitigated Adverse Impacts on Coastal Resources and Future Water Dependent Uses and Development

---

1. Describe any adverse impacts that remain after employing all reasonable mitigation measures.

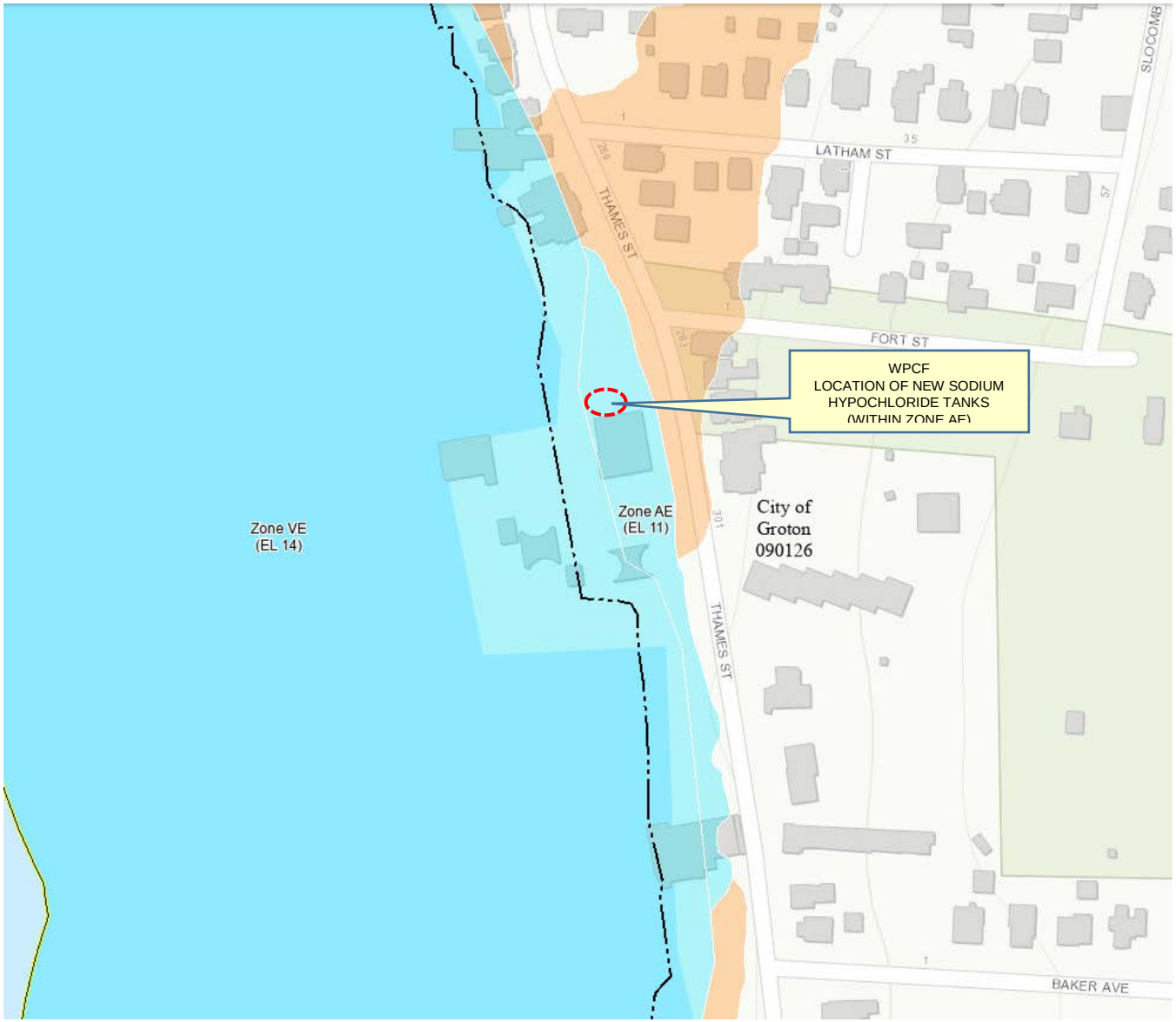
See previous narratives. No adverse impacts are anticipated for this project.

2. Explain why these other remaining adverse impacts were not mitigated.

See previous narratives. No adverse impacts are anticipated for this project.

3. Explain why the Commission reviewing this application should find these remaining adverse impacts to be acceptable.

There are no adverse impacts. As such we feel the Commission will find the project to be beneficial through an improved treatment process to both the adjacent marine environment and to the current industries along the developed shoreline in this area.



FEMA FLOOD ZONES