

Harry Clark
130 Old Highway
Wilton, CT 06897

Water Pollution Control Authority
Wilton Town Hall
238 Danbury Road
Wilton, CT 06897

1/12/23

Members of the WPCA,

Regarding Application for Sewer Extension, Allocation of Sewer Capacity, and Approval to Connect a Multi-Family Development at 19 Cannon Road,

I have strong misgivings about the design of this extension. Specifically:

- If the town takes ownership of the forced main, this puts the taxpayers of Wilton on the hook for maintenance of a potentially troublesome and complicated sewer line. Unlike a large-diameter gravity sewer, a small-diameter forced main is subject to biofilm accumulation, solids deposition, and gas pocket accumulation. All of these conditions can cause a reduction of flow, requiring service. There will be ongoing expenses for the town. See www.ohiowea.org/docs/1430_Low_Velocities_in_FMs.pdf
- If the town takes over ownership of the pumping station, monitoring the pumping station alarms is a necessary, but problematic commitment of resources for the town. At a minimum, it adds workload to an already busy Public Works department. If the alarm fails to alert the Public Works director during a pump failure event, and sewage backs up into residences, the town may be liable for damages. This is a huge risk.
- The 12 hours capacity of storage is insufficient if a pump really does go down- can a contractor respond quickly enough? Are there spare pumps readily available? Are pumping trucks that handle pumping the volume and distance required to bypass the forced main readily available to respond? Is this a common arrangement in the United States?
- If the town takes over ownership of the forced main, but not the pumping station, is the town liable for expenses incurred for a "pump emergency" if the forced main is the source of the clog/ break? If so, this is an unnecessary risk and cost to the town.
- The capacity of the 8" main on Danbury Road will be essentially completely used up by this one project. It therefore precludes any additional orderly and appropriate development of Cannondale. This is unfair to the town, other builders, and other property owners along Cannon Road, within the core of the district. This will only benefit the applicant.

I ask that you deny the application.

Sincerely,
Harry Clark