



# **Town of Wilton WPCA Status of Sewer Allocation Evaluation 3-14-2024**

## Leading up to the 2-14-2024 WPCA meeting

- ▶ As part of estimating Average Annual Daily Flow - Craig Flaherty of Redniss & Mead provided a study dated 11/3/2023 and recommended using 55 gallons/bedroom.
- ▶ The Town and Wright Pierce Engineering reviewed the study. It was discussed at the 2-14-24 meeting, Town and Consultant recommended:
  - a) Wright Pierce recommended using 65 gallons/person - but could not estimate average number of people per apartment.
  - b) Not knowing what the legal consequences are for potentially going over the Average Annual Daily sewer limit per Interlocal agreement, Wilton evaluated other Towns requirements and attempted to average the data using:
    - ▶ 1.5 people/1 bedroom apartment
    - ▶ 3 people/ 2 bedroom apartment
    - ▶ 4 people / 3 bedroom apartment
- ▶ There were many objections from the public and developer - refer to meeting video and submitted documents.
- ▶ As part of the conclusion to the 2-14-24 WPCA meeting, further attempts were going to occur to try to fine tune the chart and fine tune average number of people per apartment

Proposed Theoretical Sanitary Sewer Flows for Projects in Construction and/or Potential Projects 2/14/2024

SHARED AT 2/14/2024 WPCA MEETING

Date	Project	Status	Approximate Addition	Pre-Construction Theoretical Flow	Original Scenario - 150g/bedroom (see below)		Alternative Scenario - 65g/person (see below)		Scenario - 55g/bedroom (requested by Redniss & Mead study)	
					Proposed Theoretical Flow	Theoretical Flow minus Preconstruction Theoretical Flow	Proposed Theoretical Flow	Theoretical Flow minus Preconstruction Theoretical Flow	Proposed Theoretical Flow	Theoretical Flow minus Preconstruction Theoretical Flow
<b>Current 12 month daily average as of December 31, 2023 : 544,000 gallons per day</b>						<b>544,000.00</b>		<b>544,000.00</b>		<b>544,000.00</b>
<b>WPCA APPROVED PROJECTS</b>										
2019	300 Danbury Road	WPCA Approved - Not Built	74 Apartments	3,444.00	22,200.00	18,756.00	14,430.00	10,986.00	8,140.00	4,696.00
2022	141 Danbury Road	P&Z Approved - In Construction	171 Apartments	4,704.00	46,800.00	42,096.00	29,965.00	25,261.00	17,160.00	12,456.00
2023	12 Godfrey	P&Z Approved - In Construction	42 Apartments	1,087.00	12,150.00	11,063.00	7,572.50	6,485.50	4,455.00	3,368.00
2023	1 Cannondale Way	P&Z Approved - Not built	120 Apartments	-	22,950.00	22,950.00	14,917.50	14,917.50	8,415.00	8,415.00
2023	221 Danbury Rd	P&Z Approved - In Construction		1,080.00	1,003.00	-77.00	1,003.00	-77.00	1,003.00	-77.00
2023	241 Danbury Rd	P&Z Approved - In Construction		-	2,429.00	2,429.00	2,429.00	2,429.00	2,429.00	2,429.00
<b>Sub-Total Approved (Including Current 12 Month Daily Avg)</b>						<b>641,217.00</b>		<b>604,002.00</b>		<b>575,287.00</b>
<b>OTHER MISCELLANEOUS PROJECTS - submitted to WPCA</b>										
2009	24 Cannon Road	Came to WPCA in 2009 for partial approval - did not submit to P&Z - Capacity allocation may be expired	84 bedrooms	-	12,600.00	12,600.00	7,345.00	7,345.00	4,620.00	4,620.00
			misc other use	-		3,427.00		2,970.07		1,713.50
2022	19 Cannon Road	WPCA Appeal	70 Apartments		15,300.00	15,300.00	9,945.00	9,945.00	5,610.00	5,610.00
2024	ASML	Submitted to P&Z	167,036 SQFT (5 floors)			18,883.00		18,883.00		18,883.00
	131 Danbury Road	Submitted to P&Z	208 Apartments	2,732.00	49,350.00	46,618.00	31,817.50	29,085.50	18,095.00	15,363.00
<b>Sub-Total Other/Miscellaneous</b>						<b>96,828.00</b>		<b>68,228.57</b>		<b>46,189.50</b>
<b>POTENTIAL PROJECTS</b>										
	20 Westport Rd (ASML)			-		48,000.00		48,000.00		48,000.00
	15 Old Danbury Rd	No Pre Application	207 Apartments	9,450.00	53,400.00	43,950.00	33,832.50	24,382.50	19,580.00	10,130.00
	64 Danbury Road	P&Z Pre Application or submitted	116 Apartments		30,150.00	30,150.00	19,435.00	19,435.00	11,055.00	11,055.00
	River Road Residential	???	181 Apartments		45,450.00	45,450.00	28,860.00	28,860.00	16,665.00	16,665.00
	River Road Commercial	???	10,000 SQFT			1,000.00		866.67		500.00
<b>Sub-Total Potential</b>						<b>168,550.00</b>		<b>121,544.17</b>		<b>86,350.00</b>
<b>Total Approved + Misc + Potential (Including Current 12 Month Daily Avg)</b>						<b>906,595.00</b>		<b>793,774.73</b>		<b>707,826.50</b>

Original Scenario - 150g/bedroom		
Bedrooms	People/Bedroom	Gal/Bedroom
1	2	150
2	4	300
3	6	450

Scenario by Redniss & Mead - 55g/bedroom		
Bedrooms	People/Bedroom	Gal/Bedroom
1	n/a	55
2	n/a	110
3	n/a	165

Alternative Scenario - 65g/person		
Bedrooms	People/Bedroom	Gal/Bedroom
1	1.5	97.5
2	3	195
3	4	260

Proposed Theoretical Sanitary Sewer Flows for Projects in Construction and/or Potential Projects using various Town's information 2/14/2024

SHARED AT 2/14/24 WPCA MEETING

Date	Project	Status	Approximate Addition	Town 1 Scenario - 75g/person (see below)		Town 2 Scenario - 98g/person (see below)		Town 3 Scenario (see below)		Town 4 Scenario - 74g/person (see below)	
				Proposed Theoretical	Theoretical Flow minus Preconstruction Theoretical Flow	Proposed Theoretical	Theoretical Flow minus Preconstruction Theoretical Flow	Proposed Theoretical	Theoretical Flow minus Preconstruction Theoretical Flow	Proposed Theoretical	Theoretical Flow minus Preconstruction Theoretical Flow
<b>Current 12 month daily average as of December 31, 2023 : 544,000 gallons per day</b>					<b>544,000.00</b>		<b>544,000.00</b>		<b>544,000.00</b>		<b>544,000.00</b>
<b>WPCA APPROVED PROJECTS</b>											
2019	300 Danbury Road	WPCA Approved - Not Built	74 Apartments	22,200.00	18,756.00	18,347.56	14,903.56	15,540.00	12,096.00	13,142.40	9,698.40
2022	141 Danbury Road	P&Z Approved - In Construction	171 Apartments	46,800.00	42,096.00	37,956.38	33,252.38	32,830.00	28,126.00	29,073.12	24,369.12
2023	12 Godfrey	P&Z Approved - In Construction	42 Apartments	12,150.00	11,063.00	9,101.26	8,014.26	7,910.00	6,823.00	7,596.84	6,509.84
2023	1 Cannondale Way	P&Z Approved - Not built	120 Apartments	22,950.00	22,950.00	20,971.02	20,971.02	19,110.00	19,110.00	16,290.36	16,290.36
2023	221 Danbury Rd	P&Z Approved - In Construction		1,003.00	-77.00	1,003.00	-77.00	1,003.00	-77.00	1,003.00	-77.00
2023	241 Danbury Rd	P&Z Approved - In Construction		2,429.00	2,429.00	2,429.00	2,429.00	2,429.00	2,429.00	2,429.00	2,429.00
<b>Sub-Total Approved (Including Current 12 Month Daily Avg)</b>					<b>641,217.00</b>		<b>623,493.22</b>		<b>612,507.00</b>		<b>603,219.72</b>
<b>OTHER MISCELLANEOUS PROJECTS</b>											
2009	24 Cannon Road	Came to WPCA in 2009 for partial approval - did not submit to P&Z - Capacity allocation may be expired	84 bedrooms misc other use	12,600.00	12,600.00	7,236.32	7,236.32	6,160.00	6,160.00	7,521.36	7,521.36
2022	19 Cannon Road	WPCA Appeal	70 Apartments	15,300.00	15,300.00	13,520.08	13,520.08	12,040.00	12,040.00	10,238.64	10,238.64
	ASML	Submitted to P&Z	167,036 SQFT (5 floors)		18,883.00		18,883.00		18,883.00		18,883.00
	131 Danbury Road	Submitted to P&Z	208 Apartments	49,350.00	46,618.00	41,982.22	39,250.22	37,030.00	34,298.00	32,167.80	29,435.80
<b>Sub-Total Other/Miscellaneous</b>					<b>96,828.00</b>		<b>82,076.73</b>		<b>74,431.03</b>		<b>69,026.02</b>
<b>POTENTIAL PROJECTS via P&amp;Z</b>											
	20 Westport Rd (ASML)				48,000.00		48,000.00		48,000.00		48,000.00
	15 Old Danbury Rd	No Pre Application	207 Apartments	53,400.00	43,950.00	42,743.68	33,293.68	37,520.00	28,070.00	34,254.60	24,804.60
	64 Danbury Road	P&Z Pre Application or submitted	116 Apartments	30,150.00	30,150.00	25,127.20	25,127.20	21,840.00	21,840.00	18,967.68	18,967.68
	River Road Residential	???	181 Apartments	45,450.00	45,450.00	36,801.94	36,801.94	32,410.00	32,410.00	29,392.80	29,392.80
	River Road Commercial	???	10,000 SQFT		1,000.00		930.00		890.00		860.00
<b>Sub-Total Potential</b>					<b>168,550.00</b>		<b>144,152.82</b>		<b>131,210.00</b>		<b>122,025.08</b>
<b>Total Approved + Misc + Potential (Including Current 12 Month Daily Avg)</b>					<b>906,595.00</b>		<b>849,722.77</b>		<b>818,148.03</b>		<b>794,270.82</b>

**Town 1**  
Treatment Plant Capacity: 1.2  
Average as of Jan 2024: 0.9  
Percent Used 75.0%

**Town 2**  
Treatment Plant Capacity: 3.2  
Average as of Jan 2024: 2  
Percent Used 62.5%

**Town 3**  
Treatment Plant Capacity: 4  
Average as of Jan 2024: 2.6  
Percent Used 65.0%

**Town 4**  
Treatment Plant Capacity: 9  
Average as of Jan 2024: 8.5  
Percent Used 94.4%

Bedrooms	People/Bedroom	Gal/Bedroom
1	2	150
2	4	300
3	6	450

Bedrooms	People/Bedroom	Gal/Bedroom
1	1.5	147
2*	2.53	247.94
3*	2.53	247.94

\* people/bedroom = census avg people per household in Town

Bedrooms	People/Bedroom	Gal/Bedroom
1	N/A	140
2	N/A	210
3	N/A	210

Bedrooms	People/Bedroom	Gal/Bedroom
1*	1.62	119.88
2*	2.4	177.6
3*	3.6	266.4

\* people/bedroom determined by Town's DPW

## Following the 2-14-2024 WPCA meeting, the Town conducted the following:

- 1) First Selectwomen Toni Boucher contacted Mayor Rilling's office requested to discuss future sewage capacity for the Town of Wilton.
- 2) We contacted WestCOG to obtain available census data. The information provided indicated approximately 2.47 people per rental/unit in Fairfield County. We felt this information was not completely applicable because it wasn't clear if the "2.47" value distinguish the difference between occupancy of 1 bedroom apartments verses 2 bedroom apartments verses 3 bedroom apartments.
- 3) Since these discussions heavily involve projects that previously came through the WPCA but have not been built yet - the result of these discussions can effect their requested sewer allocation. We reached out to the Design Engineers of record for the following projects: 1 Cannondale Way - Hotel (via email on 2/22/2024) & 141 Danbury road (via email on 2/22/2024) to obtain their opinion of theoretical sewer discharge volumes for their respective projects. They both indicated more time is needed.

4) Since we are using actual flows at the town line and debating what option to use as the theoretical flows to add - we had to revise the charts to depict “zero” existing flows on previously approved projects if existing flows are actually zero. (i.e. 141 Danbury Rd, 300 Danbury rd, 12 Godfrey, 221 Danbury Rd, 241 Danbury Rd, etc).

5) Craig Flaherty of Redniss & Mead submitted study on 2/27/2024 indicating that their research found:

1.3 people/studio apartment

1.47 people/bedroom apartment

2.12 people/2 bedroom apartment

2.94 people/ 3 bedroom apartment

We added a series of columns to depict the above and used 65 gallons/person. Charts were revised accordingly under the column “Alternative Scenario 2 (3-14-24)”

- 6) Craig Flaherty (Redniss & Mead) submitted additional information on 3/6/2024 supporting 55 gallons/bedroom including another report from a different developer also supporting 55 gallons/bedroom.
- 7) 5 new correspondence from developers requesting additional sewer allocation were submitted for our 3-14-2024 meeting. These applications were not reviewed at this time, other than trying to capture proposed flows to add them to the chart. The numbers shown should be considered draft and are all subject to WPCA review. The existing condition flows were not depicted - due to lack of time to review design calculations
- 8) The Town received multiple correspondence posted on the website regarding this topic not summarized above. Refer to the website.

# DRAFT - WORKING SHEET

Proposed Theoretical Sanitary Sewer Flows for Projects in Construction and/or Potential Projects 3/14/2024

Date	Project	Status	Approximate Addition	Pre-Construction Theoretical Flow A	Estimated Current Flow B	Original Scenario - 150g/bedroom (see below)		Alternative Scenario 1 (2/14/24) - 65g/person (see below)		Alternative Scenario 2 (3/14/24) - 65g/person (see below)		Scenario - 55g/bedroom (requested by Redniss & Mead study)	
						Proposed Theoretical Flow	Calculated Theoretical Flow	Proposed Theoretical Flow	Calculated Theoretical Flow	Proposed Theoretical Flow	Calculated Theoretical Flow	Proposed Theoretical Flow	Calculated Theoretical Flow
						P <sub>o</sub>	(P <sub>o</sub> - A)	P <sub>Alt1</sub>	(P <sub>Alt1</sub> - B)	P <sub>Alt2</sub>	(P <sub>Alt2</sub> - B)	P <sub>R&amp;M</sub>	(P <sub>R&amp;M</sub> - B)
12 month daily average as of February 28, 2024 : 548,000 gallons per day							548,000.00		548,000.00		548,000.00		548,000.00
<b>WPCA APPROVED PROJECTS</b>													
2019	300 Danbury Road	WPCA Approved - Not Built	74 Apartments	3444.00	0.00	22,200.00	18,756.00	14,430.00	14,430.00	10,197.20	10,197.20	8,140.00	8,140.00
2022	141 Danbury Road	P&Z Approved - In Construction	171 Apartments	4704.00	0.00	46,800.00	42,096.00	29,965.00	29,965.00	22,451.00	22,451.00	17,160.00	17,160.00
2023	12 Godfrey	P&Z Approved - In Construction	42 Apartments	1087.00	0.00	12,150.00	11,063.00	7,572.50	7,572.50	5,771.35	5,771.35	4,455.00	4,455.00
2023	1 Cannondale Way	P&Z Approved - Not built	120 Apartments	0.00	0.00	22,950.00	22,950.00	14,917.50	14,917.50	12,860.25	12,860.25	8,415.00	8,415.00
2023	221 Danbury Rd	P&Z Approved - In Construction		1080.00	0.00	1,003.00	-77.00	1,003.00	1,003.00	1,003.00	1,003.00	1,003.00	1,003.00
2023	241 Danbury Rd	P&Z Approved - In Construction		0.00	0.00	2,429.00	2,429.00	2,429.00	2,429.00	2,429.00	2,429.00	2,429.00	2,429.00
<b>Sub-Total Approved (Including Current 12 Month Daily Avg)</b>							645,217.00		618,317.00		602,711.80		589,602.00
<b>WPCA APPROVED WITH CONDITION PROJECTS</b>													
2024	ASML	Submitted to P&Z	167,036 SQFT (5 floors)	0.00	0.00	18,883.00	18,883.00	18,883.00	18,883.00	18,883.00	18,883.00	18,883.00	18,883.00
<b>Sub-Total Approved with Condition</b>							18,883.00		18,883.00		18,883.00		18,883.00
<b>OTHER MISCELLANEOUS PROJECTS - SUBMITTED TO WPCA PRIOR TO 2/14/24 MEETING</b>													
2009	24 Cannon Road	Came to WPCA in 2009 for partial approval - did not submit to P&Z - Capacity allocation may be expired	84 bedrooms misc other use	0.00 0.00	0.00 0.00	12,600.00 3,427.00	12,600.00 2,970.07	7,345.00 2,970.07	7,345.00 2,970.07	5,435.30 2,970.07	5,435.30 2,970.07	4,620.00 1,713.50	4,620.00 1,713.50
2022	19 Cannon Road	WPCA Appeal	70 Apartments	0.00	0.00	15,300.00	15,300.00	9,945.00	9,945.00	8,040.50	8,040.50	5,610.00	5,610.00
2024	131 Danbury Road	Submitted to P&Z	208 Apartments	2732.00	2992.00	49,350.00	46,618.00	31,817.50	28,825.50	25,075.05	22,083.05	18,095.00	15,103.00
<b>Sub-Total Other/Miscellaneous</b>							77,945.00		49,085.57		38,528.92		27,046.50
<b>PROJECTS SUBMITTED TO WPCA FOR 3/14/24 MEETING*</b>													
2024	64 Danbury Road		116 Apartments clean room expansion	Not Verified 0.00	Not Verified 0.00	23,250.00 1,072.00	23,250.00 1,072.00	15,112.50 1,072.00	15,112.50 1,072.00	11,505.65 1,072.00	11,505.65 1,072.00	8,525.00 1,072.00	8,525.00 1,072.00
2024	20 Westport Rd		new building	Not Verified	Not Verified	48,000.00	48,000.00	34,092.50	34,092.50	26,456.95	26,456.95	19,745.00	19,745.00
2024	15 Old Danbury Rd		206 Apartments	Not Verified	Not Verified	53,850.00	53,850.00	34,092.50	34,092.50	26,456.95	26,456.95	19,745.00	19,745.00
2024	21 River Road		172 Apartments 10,000 SQFT	Not Verified	Not Verified	37,650.00 1,000.00	37,650.00 866.67	24,180.00 866.67	24,180.00 866.67	19,871.80 866.67	19,871.80 866.67	13,805.00 500.00	13,805.00 500.00
2024	440 Danbury Road		proposed two family dwelling	Not Verified	Not Verified	450.00	450.00	450.00	450.00	450.00	450.00	450.00	450.00
<b>Sub-Total Submitted for 3/14/24 WPCA Meeting</b>							165,272.00		123,773.67		108,223.07		92,097.00
<b>POTENTIAL PROJECTS</b>													
<b>Sub-Total Potential</b>							0.00		0.00		0.00		0.00
<b>Total Approved + Misc + Potential (Including Current 12 Month Daily Avg)</b>							907,317.00		810,059.23		768,346.78		727,628.50

\*Note: Flows of Projects submitted for 3/14/24 WPCA meeting are currently under review

Original Scenario - 150g/bedroom		
Bedrooms	People/Bedroom	Gal/Bedroom
1	2	150
2	4	300
3	6	450

Alternative Scenario 2 (3/14/24) - 65g/person		
Bedrooms	People/Bedroom	Gal/Bedroom
1	1.47	95.55
2	2.12	137.8
3	2.94	191.1

Alternative Scenario 1 (2/14/24) - 65g/person		
Bedrooms	People/Bedroom	Gal/Bedroom
1	1.5	97.5
2	3	195
3	4	260

Scenario by Redniss & Mead - 55g/bedroom		
Bedrooms	People/Bedroom	Gal/Bedroom
1	n/a	55
2	n/a	110
3	n/a	165



As part of preparing these charts - it is our opinion that we are getting too granular in this topic that is so subjective and we don't know our exposure to Norwalk WPCA. The reason we feel this way include, but are not limited to:

- ▶ In trying to fine tune our numbers to stay within the contractual limit. Either of the alternatives puts us slightly below the limit or slightly above the limit for any of these projects and actual amounts will not be realized for approximately 3+ years.
- ▶ We feel that the proposed flows of 55 gallons/day has zero tolerance for any kind of safety factor.
- ▶ Design Engineer of Record for the other projects approved or pending must provide their opinion of their comfort level to reduce their sewer allocation.
- ▶ Since new correspondences were submitted for additional sewer allocation, either one, more or all of these applications will put us over the limit.
- ▶ There are projects under appeal and other projects that have not completed the approval process and may have expired. The results of that are unknown at this time.
- ▶ There are other commercial properties in Wilton that are partially and/or completely vacant unrelated to these applications. The Norwalk/Wilton meter is currently not realizing the full flow potential from those properties. This could not be quantified. As these properties become more occupied at some point in the future, additional flows will be realized at the meter further potentially putting us over the limit.
- ▶ Even though Infiltration & Inflow (I&I) projects will continue on a yearly basis, actual flows at the Town line fluctuate on a daily basis. Our sanitary collection system is small and there's not enough (I&I) to remove to solve the flow issues relative to accepting all applications. I&I projects are intended to be proactive and minimize infiltration to acceptable levels. As the system continues to age, additional (I&I) will be realized.

**Therefore, in consideration of the above and since we are required to share Wilton Development projects with Norwalk WPCA to allow them an opportunity to review prior to our authorization to connect, we contacted them to coordinate:**

- 1) Informed Norwalk of the amount of new projects submitted to Wilton WPCA.
- 2) Sent status summary of all Wilton projects submitted to Wilton WPCA with estimated theoretical flow options and corresponding estimated flow totals at the Town Line.
- 3) Since flows will approach contractual limits, requested obtaining their input of the theoretical flow options for these types of projects so we can use as guidance for our review.
- 4) Since flows will not be realized for approximately 3 years, requested coordination to discuss Norwalk's requirements should actual flows inadvertently exceed contractual limits .

Norwalk and Wilton are coordinating with consultants to set up a time to meet.

We also feel that once modifications to the “theoretical flows” are finalized, other potential policies may need to be in place.

Potential additional policies may include, but are not limited to:

- ▶ Obtain authorization from owners and Water Company to automatically receive their water meter readings.
- ▶ Impose fees should actual water meter readings exceed requested sewer allocation amounts. This would apply to any of the pending and approved projects listed in the charts.