

Harold Thompson
12 Briar Hill Drive
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October 6, 2014

Board of Selectman
Old Lyme, CT

Dear Members,

It is with interest that I have been attending meetings of the WPCA, specifically to observe and listen to the proposal to install sewers in some of the beach communities.

We all know that public sewers are installed at Point O'Woods and that Old Lyme Shores and Old Colony Beach have received a directive from the CT DEEP to install sewers. These beach areas are going ahead with sewer projects under their respective WPCA's and personally, I wish them well. I've heard discussions that Miami Beach may also go forward with sewers but currently have not done so.

The Planning Commission is concerned about a number of factors for the proposed project. This includes a lack of oversight, the need to meet a schedule for the installation of sewers, proposed funding and the lack of a report that supports the need for sewers. The concern expressed by the Planning Commission will be forwarded to the Board of Selectman and the WPCA.

As a resident of Old Lyme, I am concerned with a number of issues regarding this project. This includes but is not limited to the following:

A final report being prepared by Woodward and Curran is not available. Specific information relating to the need for sewers in the beach communities is not available. The report being prepared by Woodward and Curran should include any test data and sampling locations. The report should conform to the guidelines established in the Freedom of Information Act.

For any engineering project there should be a problem statement and a supporting resolution. None has been submitted for review or discussion.

The Connecticut State Plan for Conservation and Development states the introduction of or expansion of public water or sewer services is to be done only when there are demonstrated environmental, public health, public safety or general welfare concerns and then are to be implemented at a scale that corresponds to the existing need without an expansion of services. Again, the basis for going forward with this project is not included in the Wastewater Management Plan for the Town of Old Lyme. Please clarify the conditions that specifically demonstrate the concerns affecting the health and well being of the public.

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Woodward and Curran were retained to perform an engineering study. However, it appears that they are continuing with a preliminary design. Normally an engineering firm is hired following a bid process and this does not appear to be the case. What firms were interviewed for this proposed study?

The size and the scope of the proposed project appears to be changing. Why is the Town of Old Lyme planning a vote on funding this project when the size and scope of the project is not yet defined? I find it hard to believe that a lending institution would consider funding a project simply based on a concept.

In a recent meeting, residents of Hawk's Nest and White Sands Beach have stated that they are not interested in a sewer system. Are these areas still being included in the current project?

In the September 30, 2014 handout prepared by Woodward and Curran, it was noted that "Sewered property owners to repay in full." This appears to be in direct conflict with a CT statute. Based on information provided by the White Sands Beach Association, Old Lyme could be liable for approximately 50% of the cost of installing sewers in the beach areas. This would exclude the currently chartered areas but if the Town mil rates increases, it would appear feasible that these communities would also be sharing in the cost of this project.

The capacity of the New London system is also an unknown. Listening to a WPCA discussion, one commission member mentioned that there would be a restricted increase in capacity from Old Lyme to New London due to the current available capacity of the New London system. Moments later, there was a comment about installing a larger diameter pipe to carry additional capacity. This was a confusing discussion and contradictory information.

I am concerned that as a Town, we are moving ahead with a project based on incomplete information and are considering implementing a system that is not fully supported by the beach communities. It would also appear that the Town will likely become liable for a significant portion of the installation cost and may also be liable for future operating and maintenance costs. It would also appear that any such project would benefit a very small segment of the Town and the beach communities.

Respectfully submitted,

Harold Thompson P.E.