



TOWN OF FAIRFIELD
CONSERVATION DEPARTMENT

ORIGINAL

March 17, 2015

Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06051

Re: Petition No. 1120: UI Declaratory Ruling petition to the CT Siting Council for 180 Hawthorne Drive, Fairfield, CT for modifications to the existing substation

To whom it may concern:

Regarding the above-referenced pending application at the CT Siting Council for a Declaratory Ruling asking that no Certificate of Environmental Compatibility and Public Need is required for the proposed modifications to the Hawthorne substation located at 180 Hawthorne Drive, Fairfield, CT, I would like to further explain and discuss the third comment of the Fairfield Inland Wetland Agency in their December 2014 comments, which I drafted, related to storm water detention.

UI is proposing to change pervious wooded area to impervious area/paved areas which accelerates runoff which is expected to adversely impact the adjacent off-site small wetland and watercourse with erosive flows and sedimentation. Those impacts can and should be mitigated with proper storm water detention. They have not shown subsurface detention units or a surface rain garden or detention basin—that is why in December I recommended, and the Inland Wetlands Agency sent comments that recommended that such storm water detention be provided. Storm water detention is a standard provision on all development projects we see in town, and has been for decades.

Storm water detention may be provided in a variety of ways. They can also use a combination of several methods to meet design criteria. They can use porous pavement or subsurface H-20 loading units under driveway areas or pavement to provide detention. They may use rain gardens at the fringe areas of their disturbances. It does not have to be all or nothing as they stated in their stormwater plan. Fairfield has required detention on homeowner-level projects as well as

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larger-scale projects, and just because it is not convenient, and that there is surrounding woodland, is not nearly enough reason to waive such a requirement here.

Sincerely,



Annette Jacobson
Conservation Administrator

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