



Town of Fairfield

THOMAS R. BREMER
CHIEF ADMINISTRATIVE OFFICER

725 Old Post Road
Fairfield, CT 06824

May 2, 2022

Ms. Stephanie DiBetitto
NFIP Specialist | Mitigation | FEMA Region 1
Federal Emergency Management Agency
Via email: stephanie.dibetitto@fema.dhs.gov

RE: Town of Fairfield - PA ID: 001-26620-00, FEMA – 4087-DR-CT, Project Worksheet 680

Dear Ms. DiBetitto:

As a follow-up to my previous letter of February 25, 2022, and in response to our meeting held shortly thereafter, I am providing additional information regarding Penfield Pavilion (the “Pavilion”) and the Town of Fairfield’s ongoing efforts to effectively respond to and, it is our hope resolve, the outstanding Notice of Violation dated November 28, 2018 (the “NOV”).

This letter summarizes various engineering options, each of which is substantively compliant with applicable FEMA regulations, in response to the matters identified in the NOV. We respectfully request that FEMA review these engineering options as well as the Insurance Exclusion Resolution, as described in the conclusion, and reply with the agency’s concurrence, if appropriate, that each of the engineering options is compliant and, if implemented, each of those options or the Insurance Exclusion Resolution would resolve the NOV. The First Selectwoman plans to engage with the public after the options have been vetted – and upon receipt of FEMA’s concurrence – to involve residents in deciding how best to proceed.

Each of the following options incorporates several common components. First, we have assumed that work at the Locker Room building, which is solely supported by timber piles without grade beams, will be limited to the removal of contaminated fill and replaced with suitable clean fill. Further, the relevant cost estimates to remediate are **included** in the numbers provided as each option affects the cost to remediate. We anticipate the complete removal of all contaminated fill and as such do not anticipate any regulatory problems with these approaches. Finally, for each option, we plan to only replace the fill up to the eight-foot elevation level, which is somewhat below the current elevation. As such, we believe this eliminates the question of what the historical elevation should be or was.

Finally, it should be realized that the numbers provided herein are **estimates** only. No requests for proposal have been issued through the Town's procurement process and these estimates comprise the "best guess" by the Town's experts. These numbers are being used internally to provide a sense of magnitude only – that is, the estimated costs associated with each conceptual option.

Option #1

Demolish the existing Pavilion building and remove the grade beam foundation.

Specifically:

1. Remove all decking, stairs and ramps
2. Demolish Pavilion Building
3. Conventionally remove all contaminated fill and grade beam foundation under the Pavilion
4. Vacuum remove all contaminated fill from under Locker Room (sequenced by bay)
5. Supplement timber piles under Locker Room with helical piles and place fill
6. Install new piles and new fill under Pavilion footprint
7. Build new timber super structure and new Pavilion at higher elevation
8. Build new deck, stairs and ramps to new finish floor elevation

Total Estimated Cost: \$10.1 million.

Option #2

Move the Pavilion to the parking lot and remove the grade beam foundation.

Specifically:

1. Remove all decking, stairs and ramps
2. Move Pavilion to the parking lot
3. Conventionally remove all contaminated fill and grade beam foundation from under the Pavilion
4. Vacuum remove all contaminated fill from under Locker Room (sequenced by bay)
5. Supplement timber piles under Locker Room with helical piles and place fill
6. Install new timber piles and fill under Pavilion footprint
7. Install new Structural Steel Platform to support existing building on new timber pilings
8. Build new Timber Super Structure
9. Move Pavilion back to original footprint
10. Build new deck, stairs and ramps to new finish floor elevation

Total Estimated Cost: \$9.6 million

Option #3

Leave building and foundation in place and replace only those grade beams that are parallel to the shoreline.

Specifically:

1. Remove all decking, stairs and ramps
2. Vacuum remove all contaminated fill from underneath all structures, under engineer's supervision, in an alternating bay sequence
3. Supplement foundation under both structures as appropriate, with additional helical piles
4. Install new grade beams below 8 ft. elevation parallel to shoreline under Pavilion
5. Remove (Cut) grade beams parallel to shoreline
6. Attach/Reinforce new grade beams to existing structure and new helical piles
7. Sequentially replace fill under both structures
8. Build new deck, stairs and ramps to new finish floor elevation

Total Estimated Cost: \$10.2 million

Option #4

Leave building and foundation in place and replace all grade beams regardless of shoreline orientation.

Specifically:

1. Remove all decking, stairs and ramps
2. Vacuum remove all contaminated fill from underneath all structures, under engineer's supervision, in an alternating bay sequence
3. Supplement foundations under both structures as appropriate, with additional helical piles
4. Install new grade beams below 8 ft. in elevation parallel and perpendicular to the shoreline under Pavilion
5. Remove (Cut) all grade beams at the current elevation
6. Attach/Reinforce new grade beams to existing structure and new helical piles
7. Sequentially replace with fill under both structures
8. Build new deck, stairs and ramps to new finish floor elevation

Total Estimated Cost: \$11 million

CONCLUSION

Based on our cost estimates, there is little differential between these options, and the cost of each is extreme, especially when considering that the last rebuild was done in 2017 for less than eight million dollars. While we acknowledge FEMA's position that the current building is not in compliance, we also note that, consistent with FEMA's written acknowledgement in the NOV that corrective actions involving structural modifications to the foundation of the Pavilion are likely not feasible at this point, asking Fairfield residents to bear such an extreme cost will not be well received.

Based on the expectation that none of the engineering solutions will prove feasible, the Town would like to discuss with FEMA resolution of the NOV by way of removing the Pavilion from participation and/or eligibility in any FEMA insurance program, without affecting the insurance of our residents or as to other Town structures and properties. This is the option we have referred to above as the Insurance Exclusion Resolution. Implementing this option would effectively ask our residents to bear the ultimate cost to rebuild the Pavilion sometime in the future, if and when required. If this resolution is acceptable to FEMA our First Selectwoman would ask that our residents consider the same alongside the other engineering solutions.

I hope you will find the above helpful and we await our upcoming meeting on May 9, 2022.

Sincerely,

A handwritten signature in blue ink, appearing to read "Thomas R. Bremer", with a stylized flourish extending to the right.

Thomas R. Bremer
Chief Administrative Officer