



30 Stafford

Community Overview

Stafford is a rural community of approximately 11,472 residents covering approximately 58 square miles in the Willimantic River Valley between almost parallel ranges of hills. The Town of Stafford is comprised of the borough of Stafford Springs, the village of Staffordville, the hamlet of Orcuttville, the village and historic district of Stafford Hollow, the village of Hydeville and West Stafford. Stafford's main industry is manufacturing of woolen products, printed circuits, filters, metal bushings and bearings, precision medical devices, fly rod components, and nameplates and labels. Other important industries are nursery and horticultural products, health care services, seasonal camping, motor sports, and recreation. TTM Industries' three locations (Industrial Park Road, Upper Road, and Old Monson Road), 3M Inc. (located on River Road) and Willington Name Plate (located on Middle River Drive) all utilize various hazardous materials which are reported to the Local Emergency Planning Committee (LEPC). TTM's facility on Upper Road is located within 500 yards of the Staffordville School and plans exist to address this specific hazard both at the facility, the school, and the Staffordville Fire Department.

Stafford is currently seeing the construction of a two-phase senior housing complex, with the first complex completed in 2019 on Woodland Springs Drive and the second one in progress at 55 Woodland Springs. In addition to senior housing, sporadic individual housing units are being developed across the town, but no major subdivisions are proposed or underway. Nominal residential development near the hospital could potentially occur in the next few years. It is unlikely that development will occur in areas of flood risk but if it does, strict adherence to state and local flood regulations and the state building code will reduce overall risks.

Critical Facilities

A number of critical facilities in Stafford are listed here.

Table 30-1: Critical Facilities, Stafford

Facility	Shelter	Cooling Center	Generator
Johnson Memorial Hospital			X
Evergreen Health Care Center			X
Library Annex (EOC)			X
Resident State Trooper Office			X
Staffordville School			
Stafford Middle School	Primary		X
Wastewater Treatment Plant			X
West Stafford Fire Department (Secondary EOC)			X
Senior Center	Secondary	X	X
Library		X	X

During extreme heat events, Stafford Senior Center and Stafford Public Library can both be opened as public cooling centers. Both facilities have generators. The Stafford Senior Center is used as a secondary shelter.

The primary EOC was relocated from the West Stafford Fire House to the Library Annex. The secondary EOC was moved from the center fire and ambulance station to the West Stafford fire department so that it is no longer in the flood plain.

Capabilities

Hazard mitigation is incorporated into Stafford's Plan of Conservation and Development (POCD). POCD actions specifically address natural hazards, specifically dam failure and flood control. Stafford has incorporated Floodplain Regulations into its Zoning Regulations, and has not permitted any new construction in the 100 Year flood plain since 2008. In 2010, the Town revised its Inland Wetlands and Watercourses Regulations to be in accordance with the State model regulations. New developments are required to construct flood storage capacity on site.

Stafford's emergency shelter is Stafford Middle School and back up is the Stafford Senior Center

Approximately 15% of Stafford is on public water with pressurized hydrants; eastern Stafford has nine dry-hydrants to provide firefighting water. The Town has tanker trucks to deliver water to other locations.

Stafford has identified an alternative site to construct a new fire station, which will replace the existing one that is located in a flood zone. This site is "shovel ready" but construction is delayed while funding is secured.

Many flood mitigation projects at the Wastewater Treatment Plant (WWTP) have been implemented, and it is now mostly protected. Additional elevation and pump installations, the final piece of a larger WWTP flood mitigation effort, are currently underway.

The Town has developed plans for upgrading the storm drainage infrastructure off of Furnace Avenue and High Street. The Town is working to secure funding to implement the plan.

Stafford now employs a salt mixture for pre-treating roads in anticipation of winter storms. Not only does this aid in safeguarding drivers during such events, but the road treatment, consisting of approximately 25% sand, also reduces the frequency of potential clogging in stormwater infrastructure caused by sedimentation.

A map modernization effort by FEMA is currently underway for Tolland County, but its full extent, and how much of Stafford it will cover, is unknown.

Since the 2019 HMP, the following actions have been incorporated as capabilities:

- Conduct outreach to local small businesses with the aim of preventing the accidental release and pollution from chemicals stored and used at their facilities during or following natural hazard events.
- Participate in EMI courses or the seminars and annual conference held by the Connecticut Association of Flood Managers.

Capabilities to address natural hazards and the losses that they have caused, have increased since the last plan has been adopted.

Challenges

Challenges Overview

The primary natural hazard for Stafford is riverine flooding or possible failure of one of the fifty-seven dams in Town or in upstream communities. Most flood damage has been caused by the Middle River and Furnace Brook and their tributaries. Severe damage has historically occurred at the Stafford Water Pollution Control Facility due to flooding of the Willimantic River. Other at-risk areas include Rt. 32 south of the town as well as numerous smaller town roads. Storm drainage infrastructure off of Furnace Avenue and High Street is undersized. The center fire ambulance station is in a flood zone, and the spillway at the mill upstream of the station is breached and in need of cleaning. The railroad tracks near the fire station are also impacted by flood events; the railroad bridge can become clogged, backing up water to the fire station. The Resident State Trooper station also floods regularly due to storm drainage issues. Staffordville School is occasionally isolated by floodwaters that inundate the surrounding roads. An ultraviolet wastewater disinfection system, associated with the WWTP, has been damaged by flooding in the past.

CT DEEP has classified eight of the fifty-seven dams in or upstream of Stafford as High Hazard (Class C). Five of the High Hazard dams are owned and maintained by the State. The remaining three are privately owned: the Staffordville Reservoir Dam, the Warren Pond Dam, and the Riverside Pond Dam. There are six Significant Hazard (Class B) dams. Of these six, the State Connecticut owns the Bradway Reservoir Dam #4; all other Class B dams are privately owned. There are eleven privately owned and one municipally owned category BB (Moderate Hazard) dams. All seventeen category A and AA dams are privately owned. Fourteen dams have no hazard or owner designation. Seven of these dams lie in sequence, creating a risk of cascading failure and potentially high damage to the downtown area. This issue is ranked among the most concerning to Stafford officials.

Stafford is heavily wooded. The town experienced a lot of tree damage and power outages for about a week after T.S. Isaias. The rural areas of town were a bit harder to get to and Eversource reportedly needed longer to get out there.

Stafford faced significant flooding concerns during various storms. The town's infrastructure, particularly its roads, was notably impacted, with Hopyard Road, a historic resource, experiencing washouts due to its inability to be paved and beavers creating dams causing water over the roads. Olympic Avenue also suffered from flood-related damage caused by water runoff from the mountains. Tetrault Road had to be temporarily closed due to drainage issues during the storms. Furthermore, residents in some areas had to contend with flooding in their yards and basements. Colburn Road, Handel Road, Willington Avenue, Highland Terrace, and Hampden Road all experience roadway damage during high storm water events due to lack of proper drainage and poor roadway alignment.

Stafford staff reported challenges related to extreme heat and the needs of vulnerable populations. The town experiences a higher demand for cooling centers than other municipalities. Moreover, Stafford has two elderly housing complexes, 55 Woodland Springs and Averly Park, where air conditioning is only available in limited areas. Concerns about power outages during a storm prompted the evacuation of elderly residents from Averly Park to the senior center in the past. While there is some backup power for

these complexes, it's insufficient to sustain the entire facility, potentially leaving residents without essential cooling during heatwaves. Town staff acknowledges the ideal solution would involve providing full AC and comprehensive generator power for these complexes, but budget constraints have prevented this so far.

Town staff reported that the Fire station that is in the floodplain, which is of a concern.

Downtown Stafford relies significantly on a sanitary sewer system, and there's potential funding from ARPA to enhance the Water Pollution Control Facility.

Johnson Memorial Hospital underwent an infrastructure upgrade with the installation of a new water tank, enabling water supply from Somers. The completion of the water line, granted the industrial park access to this essential water source.

Hazard Losses

The economic losses faced by the community from natural hazards can be estimated by reviewing historic loss figures. Loss estimates are summarized below.

Average Annualized Losses

Average Annualized Loss (AAL) estimates are summarized below. Average Annualized Loss (AAL) figures are useful tools for comparison of the risks faced from different hazards with different likelihoods of occurring in a given time period. AAL estimates were prepared for each natural hazard which may impact Stafford. National Centers for Environmental Information (NCEI) data, from the last 20 years, was categorized by hazard and averaged based on the proportion of population within each town in the CROCG Region. National Flood Insurance Program (NFIP) losses were calculated based on the 50 year span of the program. FEMA Public Assistance (PA) data from the past 11 years was categorized based on hazard and used to compute AAL. United States Department of Agriculture (USDA) from the past 10 years was calculated to get AAL. Expected Annual Loss data from the National Risk Index (NRI) was downloaded and categorized to get AAL for the below hazards. Dam failure data was taken from the 2019-2024 CROCG Hazard Mitigation Plan (HMP) plan since no new dam failures have occurred in the past five years. The 2019 HMP Dam failures were sourced from the 2014 Connecticut Natural Hazard Mitigation Plan Update, with dam failure data supplemented by the National Performance of Dams Program and the Connecticut Department of Energy & Environmental Protection.

Table 30-2: Average Annualized Losses, Stafford

Hazard	Source	Average Annualized Losses (AAL)
Hurricanes/Tropical storms	NCEI	\$29,481.07
	NRI	\$604,529.78
	FEMA PA	\$8,381.63
Tornados/High Winds	NCEI	\$11,037.17
	NRI	\$107,073.78
Winter Storms	NCEI	\$8,743.42
	NRI	\$53,996.88
	FEMA PA	\$9,579.54
Flood	NCEI	\$8,936.13
	NRI	\$79,990.19

Hazard	Source	Average Annualized Losses (AAL)
	NFIP	\$7,766.15
Drought	NRI	\$909.16
	USDA	\$0.00
Extreme Heat	NRI	\$1,922.47
Wildfire	NRI	\$9,828.89
Earthquakes	NRI	\$16,546.99
Dam Failure	HMP	\$753.00

Other Hazard Costs

Six floods between 1900 and 1980 caused damage of more than half a million dollars each. The 1955 flood resulting from Hurricane Diane caused an estimated 1.3 million dollars in damage.

The most severe historical damage caused by dam failure occurred in the spring of 1877 and cost the community approximately \$400,000 in damage, the loss of two lives, and long-term economic hardship for businesses in its path.

Losses Summary

A review of the above loss estimates demonstrates that the Town of Stafford has experienced significant expenses as a result of natural hazards, and is at risk for additional losses if some of the less-frequent events were to occur. These actual and potential losses justify hazard mitigation actions to reduce losses in the future.

Mitigation Strategies and Actions

This HMCAP includes new goal statements that are aligned with *Resilient Connecticut* and the efforts of the GC3. The five new goals developed for this HMCAP were developed with cooperation from CIRCA in the *Resilient Connecticut* planning process, and are:

- Ensure that critical facilities are resilient, with special attention to shelters and cooling centers.
- Address risks associated with extreme heat events, especially as they interact with other hazards.
- Reduce flood and erosion risks by reducing vulnerabilities and consequences, even as climate change increases frequency and severity of floods.
- Reduce losses from other hazards.
- Invest in resilient corridors to ensure that people and services are accessible during floods and that development along corridors is resilient over the long term.

The previous goals of the 2019 HMP have been replaced and incorporated into these five new goals in accordance with the explanation in the Multijurisdictional document.

Noted Hazard Mitigation Needs

During the course of this Plan development, multiple hazard mitigation needs of Stafford were noted, including addressing undersized bridges and mitigating flooding at the fire station.

- Continue to work with Eversource to regularly trim and maintain trees near power lines to reduce the risk of outages during storms.
- The Fire Department needs to be relocated out of the flood zone.
- Invest in better drainage systems for roadways with inadequate drainage systems, particularly in flood-prone areas like Hopyard Road and Olympic Avenue. Evaluate options for mitigating beaver dam impacts and preventing water overflows. Develop emergency response plans for road closures and provide resources for affected residents to mitigate flooding risks
- Additional generators or other solutions to the dangerous impacts that power outages have on the elderly community are needed.

Status of Previous Mitigation Strategies and Actions

The Town of Stafford reviewed the mitigation actions proposed in the 2019 HMP and determined the status of each. That information is included in the table below.

Table 30-3: Status of Previous Mitigation Strategies and Actions, Stafford

No.	Action	Notes	Status
12	Repair Staffordville and New City dams.	Town staff believe that vegetation clearing was done at New City Dam about 2 years ago. No changes to the structure of the dams but this is still a concern.	Carry Forward
4	Initiate efforts to breach the Hydville Dam. Coordinate with CT DEEP.	Town staff said there is a mill across the street that's in disrepair and there is some talk about revitalizing that mill which has the ability to still utilize the dam. Town staff is not aware of any coordination with DEEP. CIRCA staff asked whether this is a DEEP-owned dam, but town staff were not sure. Attendees would like to carry this forward with a revision to reflect the possible redevelopment of the mill.	Carry Forward with Revisions
5	Perform a study to identify preferred actions to take to provide sufficient egress and access to and from the main fire station downtown, addressing the issues created by the undermined bridge.	Town staff said they are considering turning this fire department over to only an ambulance department and moving the fire department out of the floodplain. However, this is currently just a discussion with no concrete plans. A new catch basin was added so the undermined bridge issue has been improved with the catch basin. Carry Forward with Revisions to reflect the that the bridge issue has been dealt with.	Carry Forward with Revisions
11	Explore possible sites on which to relocate the main fire station out of the floodplain.	Town staff said this is in discussion and still of interest	Carry Forward

No.	Action	Notes	Status
14	Relocate utilities along Main Street underground during expected road and roundabout rebuild in 2020.	Town staff said they are in the middle of re-doing the roundabout now. The town staff met with Eversource to discuss the possibility of relocating utilities underground, and the cost to put the utilities underground is not feasible now. Town would like to keep an action related to relocating utilities underground in case there is money down the road, but the mention of the road/roundabout rebuild can be removed.	Carry Forward with Revisions
8	Revise Public Works personnel contracts to allow for the hiring of subcontractors during surge conditions.	Devin Cowperphwaiite said if this is referring to the collective bargaining agreement with DPW employees (drivers/laborers), the MEUI CBA already has language in it that provides management the right "to establish contracts or subcontracts for municipal operations provided that this right shall not be used for the purpose of laying off current employees in the bargaining unit." This action is no longer needed/Complete.	No Longer Needed/Complete/Remove
10	Add language encouraging Low Impact Development and limiting impervious surfaces to the Zoning Regulations	Town staff said they are currently in transition with the zoning officer, as they currently have someone in an interim role because their previous zoning officer left last year. Town staff I believe the regs already include language about ratios of pervious/impervious surfaces.	Complete/Retire
2	Expand hazard warning, advisory, and outreach efforts to social media.	Town staff said they received ARPA funds to purchase new warning signs for early warning advisory, which have been deployed. The town has also made progress with using social media for notifications.	Complete/Retire
3	Establish an annual education program for private snow-removal contractors and residents on not obstructing roads and the right-of-way.	Town staff said this hasn't been a significant issue in recent years. Town notifies the residents ahead of time with early warnings of snowstorms using the warning signs mentioned in the previous action, which accomplishes the intent of this action.	Intent is complete/Retire
6	Conduct outreach to local small businesses with the aim of preventing the accidental release and pollution from chemicals stored and used at their facilities during or following natural hazard events.	Town staff said they have reached out to businesses for prevention of accidental releases and working on this with the fire department. This is a capability.	Capability/Retire
7	Participate in EMI courses or the seminars and annual conference held by the Connecticut Association of Flood Managers.	Town staff said they do participate in trainings when they are offered. This is a capability.	Capability/Retire
9	Educate Town staff on detour protocols, and purchase more detour signage and traffic routing equipment.	Town staff said they have done this in conjunction with the new ARPA-funded notification signs. This is complete.	Complete/Retire

No.	Action	Notes	Status
13	Coordinate with CT SHPO to conduct historic resource surveys, focusing on areas within natural hazard risk zones (such as flood or wildfire hazard zones and areas near steep slopes), to support identification of vulnerable historic properties and preparation of resiliency plans across the state. This action leverages existing resources and best practices for protection of historic and cultural resources through an ongoing statewide initiative by CT SHPO.	Town staff said they are working with a third party (not SHPO) to discuss the potential creation of a historic district in the town. There is not currently a historic district in the town, but there are a number of historic structures. Town staff mentioned that historical buildings are important to residents so an action about historic buildings should be kept in the plan. CIRCA suggested that this can be revised to acquire and review the SHPO layer/.	Carry Forward with Revisions
1	Enter the Sustainable CT program through Registration and review actions that can be undertaken to pursue Certification. Make progress with the actions related to hazard mitigation.	Town is registered with SCT.	Complete/ Retire

Active Mitigation Strategies and Actions

The Town proposed to initiate several new mitigation actions for the upcoming five years. Additionally, a number of actions from the previous planning period are being carried forward or replaced with revised actions. These are listed below.

Each of the following actions has been prioritized based on FEMA guidelines, listed from highest to lowest priority, and numbered.

Table 30-4: Active Mitigation Strategies and Actions, Stafford

Number	Hazard Mitigation and Climate Adaptation Actions	Hazard Mitigation and Climate Adaptation Goal	Type of Action	Responsible Department	Approx. Cost Range	Potential Funding Sources	Timeframe	Priority	Hazard(s)	EJ?	PERISTS Score	STAPLEE Score	PERSISTIS x STAPLEE =
SF1	Explore options for relocating the fire department from the floodplain, and transitioning the facility into an ambulance-only department.	Ensure that critical facilities are resilient, with special attention to shelters and cooling centers.	Preparedness & Emergency Response	Fire Department	\$0-\$10,000	DCRF; FEMA HMA	07/2024 - 06/2027	Medium	All Hazards	No	17	6	102
SF2	Explore possible sites on which to relocate the main fire station out of the floodplain.	Ensure that critical facilities are resilient, with special attention to shelters and cooling centers.	Preparedness & Emergency Response	Fire Department	\$0-\$10,000	Municipal Operating Budget	07/2025 - 06/2026	Medium	All Hazards	No	17	6	102
SF3	Acquire generators with sufficient capacity to provide full power backup for the Woodland Springs and Avery Park complexes.	Ensure that critical facilities are resilient, with special attention to shelters and cooling centers.	Preparedness & Emergency Response	Emergency Management	\$100,000 - \$500,000	FEMA HMA; STEAP	07/2024 - 06/2025	Medium	All Hazards	No	17	5	85
SF4	Relocate utilities along Main Street underground.	Ensure that critical facilities are resilient, with special attention to shelters and cooling centers.	Preparedness & Emergency Response	Public Works	>\$1M	STEAP; FEMA HMA; Municipal CIP Budget	07/2025 - 06/2027	Medium	Hurricanes and Tropical Storms/Tornadoes and High Winds/Severe Winter Storms	No	17	3	51
SF5	Ensure that transportation and transit options are available to bring people to cooling centers.	Address risks associated with extreme heat events, especially as they	Preparedness & Emergency Response	Emergency Management	\$10,000 - \$50,000	Transit; IJJA BBFP	07/2024 - 06/2026	High	Extreme Heat	No	19	3	57

Number	Hazard Mitigation and Climate Adaptation Actions	Hazard Mitigation and Climate Adaptation Goal	Type of Action	Responsible Department	Approx. Cost Range	Potential Funding Sources	Timeframe	Priority	Hazard(s)	EI?	PERISTS Score	STAPLEE Score	PERISTS x STAPLEE =
		interact with other hazards.											
SF6	Repair Staffordville and New City dams.	Reduce flood and erosion risks by reducing vulnerabilities and consequences, even as climate change increases frequency and severity of floods.	Structural Project	Public Works	>\$1M	Municipal CIP Budget	07/2025 - 06/2027	High	Dam Failure	No	19	4	76
SF7	Initiate efforts to revitalize the mill across the street from the Hydville Dam and Coordinate with CT DEEP, as needed.	Reduce flood and erosion risks by reducing vulnerabilities and consequences, even as climate change increases frequency and severity of floods.	Structural Project	Public Works	\$500,000 - \$1M	STEAP	07/2025 - 06/2027	Medium	Riverine and Pluvial Floods	No	18	4	72
SF8	Conduct a town wide assessment of stream crossings to identify vulnerabilities and develop a priority list for maintenance and upsizing.	Reduce flood and erosion risks by reducing vulnerabilities and consequences, even as climate change increases frequency and severity of floods.	Structural Project	Public Works	\$10,000 - \$50,000	DCRF; Municipal CIP Budget	07/2025 - 06/2027	Medium	Riverine and Pluvial Floods	No	18	6	108
SF9	Design and install more resilient stormwater infrastructure for town owned roads, specifically on Hampden Road, Handel Road, Willington Avenue, Colburn Road, and Highland Terrace.	Reduce flood and erosion risks by reducing vulnerabilities and consequences, even as climate change increases frequency and severity of floods	Structural Project	Public Works	\$10,000 - \$50,000	DCRF; Municipal CIP Budget	07/2025 - 06/2027	Medium	Riverine and Pluvial Floods	No	18	6	108
SF10	Ensure that options are available to help property owners make their water supply wells resilient to droughts, floods, and loss of capacity	More than one goal.	Water & Wastewater Utility Projects	Planning	\$0-\$10,000	DWSRF; FEMA HMA; STEAP	07/2025 - 06/2026	High	Riverine and Pluvial Floods/Drought	No	19	10	190

Number	Hazard Mitigation and Climate Adaptation Actions	Hazard Mitigation and Climate Adaptation Goal	Type of Action	Responsible Department	Approx. Cost Range	Potential Funding Sources	Timeframe	Priority	Hazard(s)	EI?	PERISTS Score	STAPLEE Score	PERISTS x STAPLEE =
SF11	Expand public water systems to areas served by private wells when needed to address drought impacts and provide fire protection	Reduce losses from other hazards.	Water & Wastewater Utility Projects	Emergency Management	>\$1M	DWSRF; FEMA HMA; STEAP	07/2026 - 06/2028	High	Drought/Wildfire	No	19	8	152
SF12	Develop more water supply sources and interconnections as needed	More than one goal.	Water & Wastewater Utility Projects	Public Works	>\$1M	DWSRF; FEMA HMA; STEAP	07/2025 - 06/2027	High	Drought/Wildfire	No	19	8	152
SF13	Contact the owners of Repetitive Loss Properties and nearby properties at risk to inquire about mitigation undertaken and suggest options for mitigating flooding in those areas. This should be accomplished with a letter directly mailed to each property owner.	Reduce flood and erosion risks by reducing vulnerabilities and consequences, even as climate change increases frequency and severity of floods.	Property Protection	Planning	\$0-\$10,000	Municipal Operating Budget	01/2026 - 12/2026	High	Riverine and Pluvial Floods	No	19	7	133
SF14	Work with CT DEEP to complete a formal validation of the Repetitive Loss Property list and update the mitigation status of each listed property.	Reduce flood and erosion risks by reducing vulnerabilities and consequences, even as climate change increases frequency and severity of floods.	Property Protection	Planning	\$0-\$10,000	Municipal Operating Budget	01/2025 - 12/2025	High	Riverine and Pluvial Floods	No	19	5	95
SF15	Work with the Connecticut Institute for Resilience and Climate Adaptation (CIRCA) to develop an appropriate scope of work to address flooding and extreme heat concerns in Resilient Opportunity Areas (ROARs).	More than one goal.	More than one type	Public Works	\$0-\$10,000	CIRCA	07/2024 - 06/2027	Medium	Riverine and Pluvial Floods/Extreme Heat	No	18	5	90
SF16	Review the Connecticut Cultural Resource Information System (ConnCRIS) to identify and understand historic and archaeological resources in	Reduce flood and erosion risks by reducing vulnerabilities and consequences, even as climate change	Property Protection	Planning	\$0-\$10,000	SHPO; Municipal Operating Budget	01/2026 - 12/2026	Medium	Wildfires/Tornadoes and High Winds/Riverine and	No	18	9	162

Number	Hazard Mitigation and Climate Adaptation Actions	Hazard Mitigation and Climate Adaptation Goal	Type of Action	Responsible Department	Approx. Cost Range	Potential Funding Sources	Timeframe	Priority	Hazard(s)	EJ?	PERISTS Score	STAPLEE Score	PERISTS x STAPLEE =
	areas of hazard risks found here: https://conncris.ct.gov .	increases frequency and severity of floods.							Pluvial Floods				
SF17	Update town website to include hazard mitigation and emergency preparedness tips for town residents, including sections corresponding to each hazard considered in this Plan Update.	More than one goal.	Education and Awareness	Planning	\$0-\$10,000	Municipal Operating Budget	01/2025 - 12/2025	Medium	All Hazards	No	17	7	119

Figure 30-1: CIRCA Environmental Justice Rank and Critical Facilities, Stafford

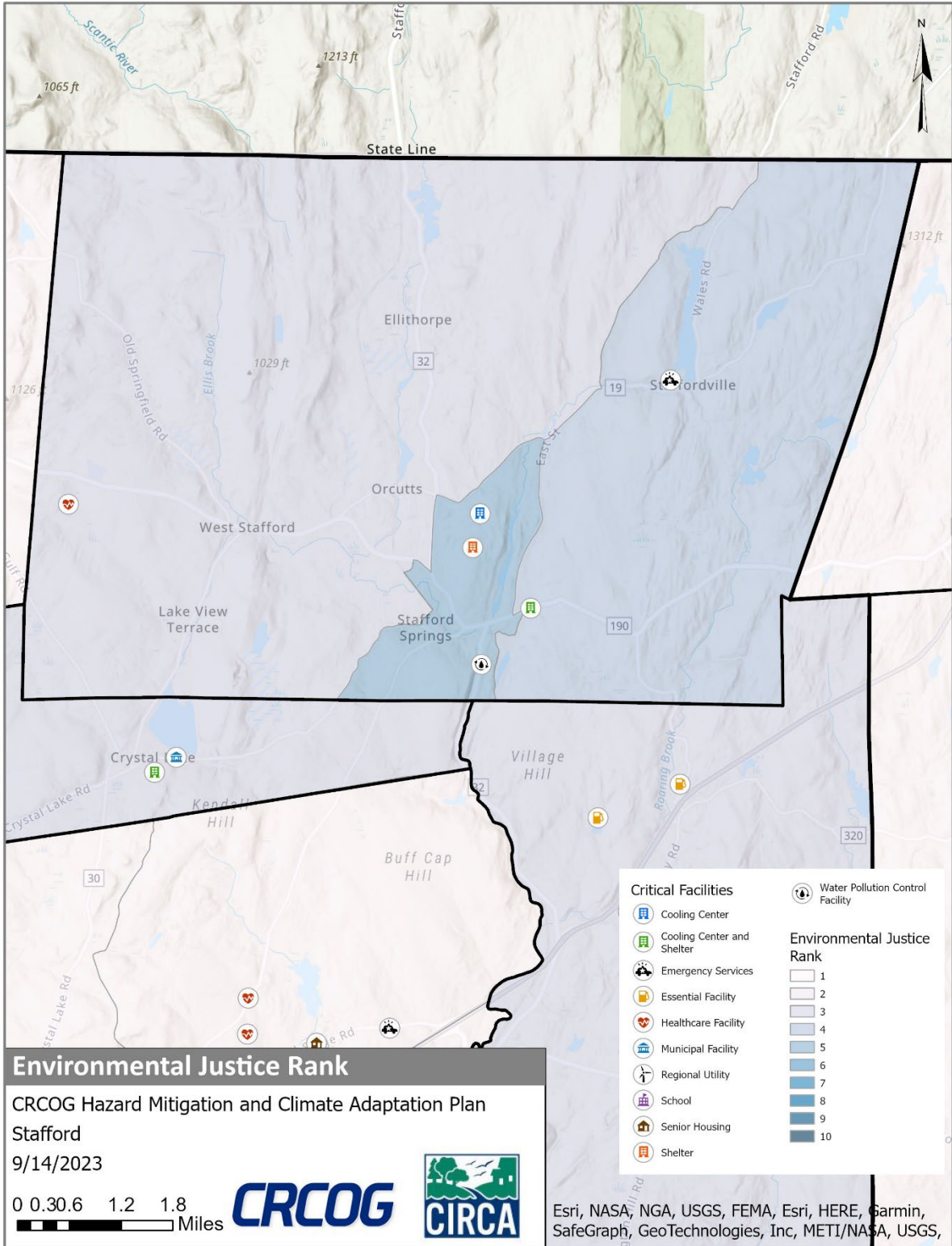


Figure 30-2: FEMA Flood Zones and Critical Facilities, Stafford

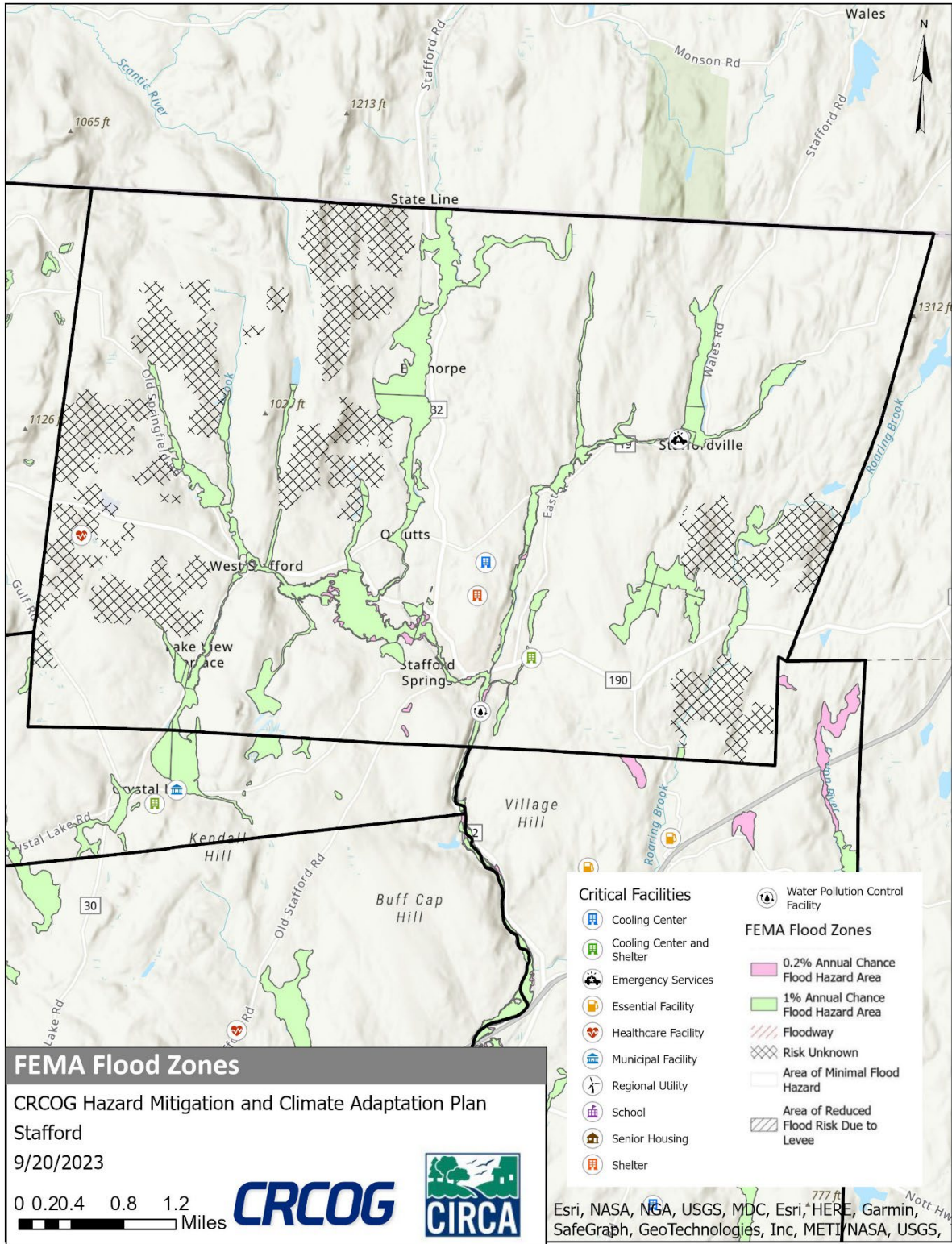


Figure 30-3: CIRCA Flood CCVI and Critical Facilities, Stafford

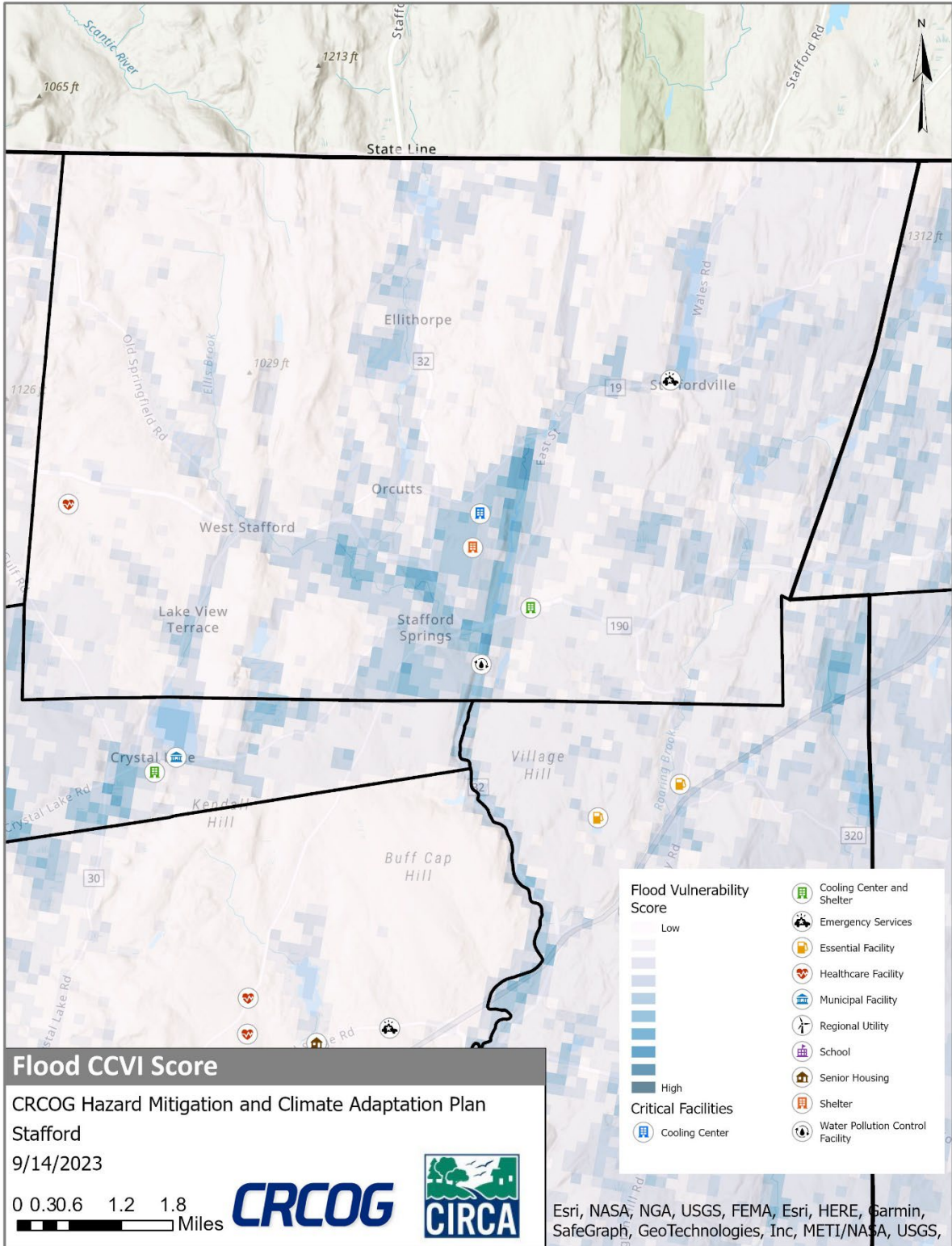


Figure 30-4: Dam Inundation Area and Critical Facilities, Stafford

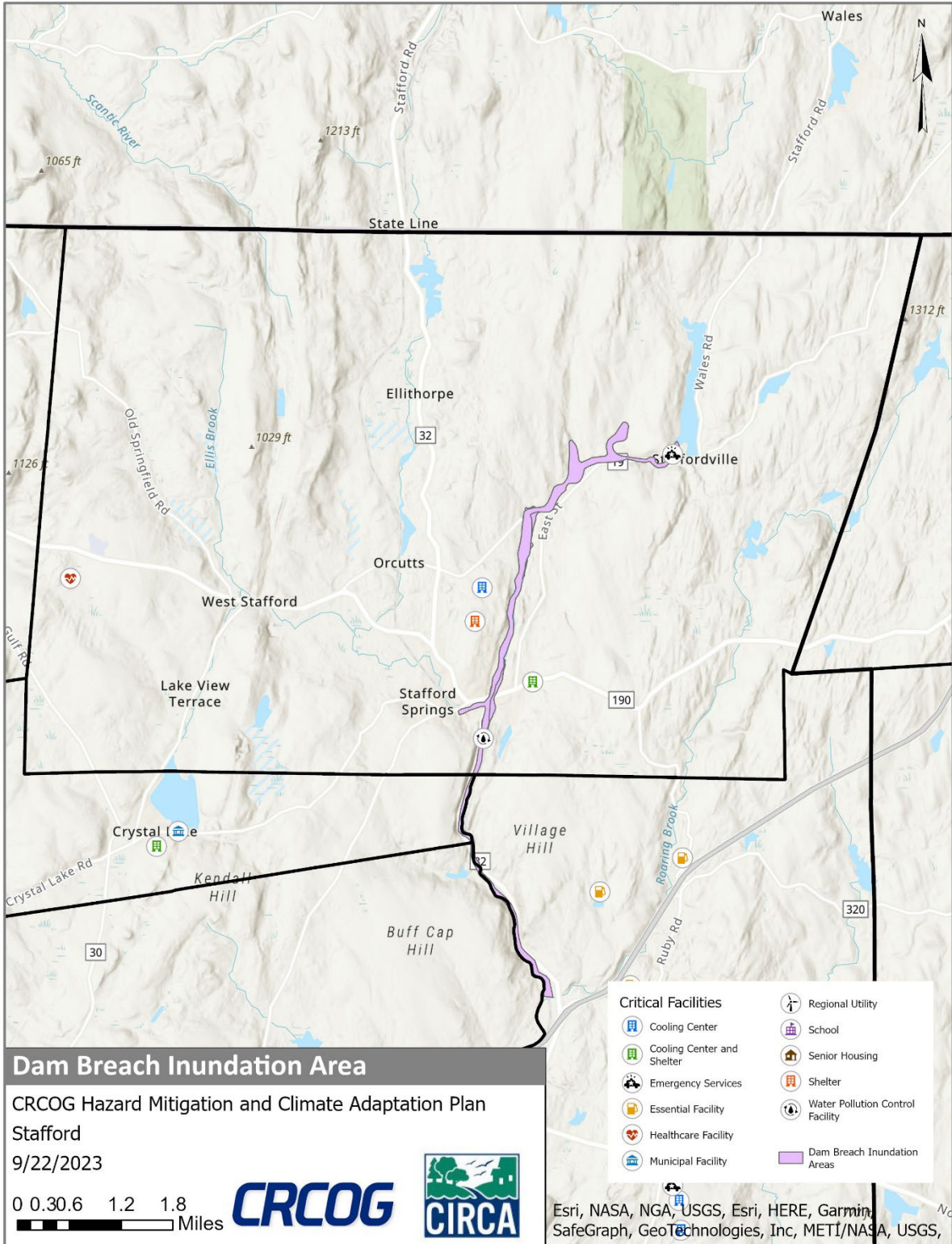


Figure 30-5: CIRCA Heat CCVI and Critical Facilities, Stafford

