



Exhibit
#59

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February 24, 2023

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736 Norwich-New London Turnpike
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LAND USE DEPARTMENT

Re: Avery Brook Homes, LLC Affordable Housing Subdivision
94-100 Stoddards Wharf Road, Ledyard, Connecticut

Dear Harry:

I thank you for the digital copy of the Effluent Renovation Analysis by A McDonald Gary Sharpe and Associates, Inc. dated February 3, 2023. As you know, the PDF of the Renovation Analysis initially provided on February 16 proved to be illegible in certain critical respects. The digital copy has addressed that problem. Groton's consultants are still reviewing the Renovation Analysis but have provided me with the following initial comments:

1. The groundwater contour map is incomplete and inconsistent in that the number of test points is insufficient and are located only within the interior of the site. The groundwater contour map does not show groundwater elevations at the property line or off-site, nor does it consider wetland or watercourse elevations directly adjacent to the applicant's property. At a minimum, additional test points are needed in order to extend the groundwater contours to the edge of the applicant's property and to reflect the connection of groundwater and surface water both on and adjacent to the development site. The problem with the applicant's groundwater contour map is particularly evident in the vicinity of the southeast corner and along the entirety of the easterly and northerly property lines. Those data gaps and the large anomaly in water table elevations near the southeast portion of the site must be resolved. Groton's experts believe that the failure to develop a comprehensive water table contour plan affects the value and trustworthiness of the analysis and that a complete groundwater contour plan will likely alter the predicted flow directions and effluent travel times with respect to adjacent wetlands and watercourses.
2. The groundwater elevation readings were taken within a short window of time and likely do not reflect seasonal changes which would typically occur around the entire perimeter of the applicant's property. What is most important to a proper analysis of effluent impacts to wetlands and watercourses is an accurate understanding of the predominant water table elevations, predominant groundwater flow directions and travel

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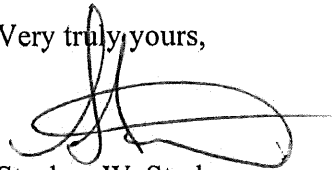
times over the course of the year, and not just those representative of early January 2023. There is no attempt in the Renovation Analysis to address the measurements made with regard to those critical factors.

3. The 2006 DEEP Guidance requires an analysis of septic system impacts on viruses, nitrogen and phosphorus. The submitted analysis does not address phosphorus, an important potential contaminant of freshwater.

In short, our initial impression is that while the Renovation Analysis submitted provides additional information, it is incomplete in that it lacks necessary, pertinent data which, as a result of those omissions, render its conclusions unreliable. Groton remains concerned that the proposal to construct 26 three-bedroom homes on the applicant's property will have a significant adverse impact on wetlands and watercourses. Accordingly, in view of the foregoing comments and concerns, Groton requests a full reevaluation of the Renovation Analysis.

Additionally, you had requested that Groton provide you with copies of any reports it intends to submit to the wetlands agency on or before March 1. Given the short period of time available to the City's experts to evaluate the Renovation Analysis and given that their review and analysis of the development proposal is ongoing, it may not be possible to comply with that request; however, we will endeavor to provide you with information in as timely a manner as possible.

Very truly yours,



Stephen W. Studer

SWS:jb

c: Juliette Hodge
Director of Land Use & Planning