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MAY 04 2026

Land Use Department

May 4, 2026

Ledyard Inland Wetland & Watercourses Commission
741 Colonel Ledyard Highway
Ledyard, CT 06339

Dear Inland Wetland & Watercourses Commission,

We are in receipt of Groton Utility comments for the residential project located at 1947 Center Groton Road. Our responses are shown below in bold italic type and are as follows:

Water Utility General Comments:

1. Existing water mains at Center Groton Rd = 16" DI – please show on Site Plan (As-built drawing is provided with these comments).

Response: The provided water main information has been added to the survey. Refer to sheet EX-1.

2. Existing Static Pressure is approximately 63 PSI static at Center Groton Road.

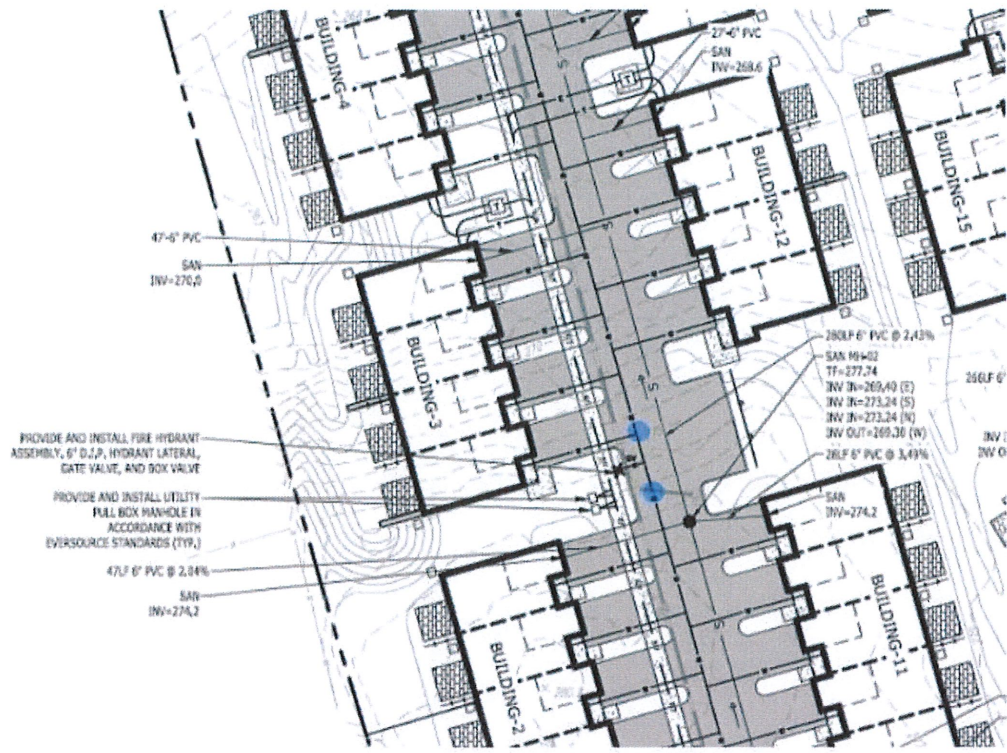
Response: Noted.

3. Request addition of "Groton Utilities (GU) noted as contract operator of Ledyard WPCA water system on page G0.01, in comments and in Definitions, for clarity.
 - a. Please update #103 required water depth from 4.5' to 4.6'

Response: Groton Utilities has been added to the definitions and note #103 has been updated to 4.6'. Refer to sheet G0.01.

4. GU requires tap to be made at the 16" DI water main on Center Groton Rd. with a tapping sleeve and valve. Please show this on the Plan. Contractor to coordinate with GU Project Management on tapping requirements and procedures. Note this on Utility Plan Sheet #8 of 13.

Response: 16" watermain is now shown on the survey and background of all plans. Callout has been revised on the utility plan to connect to existing water main with a tapping sleeve and gate valve. See plan sheet C3.00.



Gate valve on both sides of hydrant -
for isolation

Response: Applicant will coordinate with GU and the Fire Marshall on gate valves, hydrant quantity, hydrant locations. The applicant is coordinating with Groton Utilities on separation requirements.

8. Flow Demand Letter to be provided to GU Water Meter Department. GU Meter Department will size meters based on flow demand provided. Meters are provided by GU.

Response: A flow demand letter will be provided.

9. Contact GU Water Meter Department to review requirements for the layout, quantities, and sizing of meters and backflow devices at domestic and fire protection:
 - a. Groton Utilities Meter Department: 860-446-4077.
 - b. Contractor to coordinate with GU Water Meter Department for temporary water meter/backflow device rental and water usage requirements during construction.

Response: The applicant will coordinate with GU meter department for review of the noted requirements. Contractor will coordinate with the GU water meter department during construction.

10. Hydrants:

- a. Hydrant quantities and locations are to be determined/approved by Fire Marshal.
- b. Please coordinate with Groton Utilities about ownership and hydrant agreements.
- c. Three hydrants are called out via text boxes though it appears that four hydrants are drawn on the plan (one is shown in the area between building 14 and 5. Request clarification).

Response:

- a. *The applicant will coordinate with the Town of Ledyard Fire Marshall regarding fire hydrant locations and quantities.*
- b. *The developer will coordinate with Groton Utilities regarding ownership and hydrant agreements.*
- c. *A callout has been added for the 4th hydrant shown on the plans. Refer to sheet C3.00.*

11. Unmetered Fire Sprinkler Agreement will be required for annual billing.

Response: No sprinkler system is proposed for the proposed buildings.

12. Contractor to provide As-built records at project completion.

Response: Acknowledged, contractor will be informed of this requirement. Additionally, a note has been added to the utility plan (sheet C3.00)

13. Please remove Windham Water Spec details on page: C3.100 and replace with Groton Utilities' Water

Specification Sheets 1-20: Add GU Technical Drawings

- #1 – Typical Gate Box
- #2 – Gate Valve Connection Detail
- #3 - Tapping Sleeve & Valve
- #4 – Thrust Block Details
- #5 – Typical Sewer & Drain Crossing
- #6 – Hydrant Assembly Detail
- #7 – Brass Wedge Detail
- #9 – Meter Pit 1-1/2"
- #13 – Backflow Preventer Install
- #17 – Typical Trench Detail

- #19 – Typical Tracer Wire Detail
- #20 – Water Service Trench Detail

Response: Per conversations with Groton Utilities, new specifications will be provided.

14. Please contact Groton Utilities Project Manager, Kate Blacker, assigned to this project.

Response: The applicant will coordinate with Kate Blacker as requested.

15. Groton Utilities is the Contracted Water Operator (This does not include the Sewer):
Suggested coordination with Ledyard WPCA's consultants, Weston and Sampson, to review sewer and force sewer infrastructure on this project.

- a. Upon initial review, water pipes in some areas appear to be at the same depth as sewer infrastructure. Recommend further investigating the sewer to avoid conflict.

Response: Plans will be reviewed for conflicts and revised accordingly.

16. Verify with Ledge Light Health District for requirements to abandoning of two wells noted on plans.

Response: A note has been added to the demolition plan (C0.00) for the contractor to coordinate with Ledge Light Health District for well abandonment requirements.

Watershed Comments:

1. The drainage report was received on 4/23/2026 and is currently under review. Any additional comments will be provided via email.

Response: Noted.

2. Groton Utilities shall be kept fully informed throughout the planning approval process and during construction.

Response: The applicant and the Contractor will coordinate with Groton Utilities through planning and construction process.

3. Drainage

- a. Additional drainage is required. Based on the contour lines, most of the stormwater and roof runoff flows into one swale and toward the western side of the site, where only a limited number of catch basins are present. This will result in drainage issues and may cause stormwater to discharge towards our reservoir.
- b. There should be more treatment chambers, there seems to only be one that the plan calls out. An underground treatment chamber may be beneficial for this size of site.
- c. Roof - Are there any mechanics on roof? If so, an oil water separator would need to be present as well, catch any hazardous material running off the roof.
 - i. No explanation is provided in the legend for the lines shown extending from the roof

Response:

- a. *The civil plan set with a revised date of 04/22/2026 has reconfigured this area.*
 - b. *A second hydrodynamic separator was added to the plans revised on 04/22/2026. Refer to sheet C2.50.*
 - c. *Mechanical units are not roof mounted; they will be ground mounted at the rear of each unit. Lines extending from the rear of each building represent privacy fencing between the patios. A callout has been added and the linetype is added to the legend.*
4. One oil-water separator may not be adequately sized for the total volume of oil stored on-site, especially considering the proposed transformer and proposed emergency generator. Given the size of the site and the combined storage capacity of these units, additional evaluation is recommended to verify that the separator can properly manage potential spills or leaks.
- d. SPCC Plan for potential spills

Response: *A second hydrodynamic separator was added to the plans revised on 04/22/2026. Refer to sheet C2.50.*

Additionally, a SPCC Plan is required by CTDEEP when the volume of all tanks 55 gallons or larger stored on site is over 1,320 gallons of oil, or the site has an aggregate volume of 42,000 gallons of oil or more store in underground tanks, or there is a reasonable expectation that a discharge of oil to a "navigable water of the United States" or "adjoining shorelines" would result considering a possible worst-case scenario. None of these apply to the proposed site.

5. Sedimentation and Erosion Controls- Erosion and Sediment controls must be present before construction begins and inspected by GU employees throughout the entire construction process. Emergency spill prevention plans (including basic on-site spill containers and adsorbents) and procedures should be in place at each equipment and storage area during construction

Response: Groton Utilities will be kept informed throughout the planning and construction process. Erosion controls will be installed before construction begins and continually monitored and maintained throughout construction. The contractor will prepare emergency spill prevention plans. The Groton Utilities phone number, 860-446-4000, has been added to the Sediment and Erosion Control Notes for spill reporting purposes.

6. Request for the following:
 - a. Memorandum of Understanding - We recommend that a Memorandum of Understanding be filled out and agreed upon by both parties, i.e., Groton Utilities and the new site owner. The MOU will ensure future compliance through maintenance of the stormwater facilities, in keeping with a Stormwater Maintenance Plan. This should be reviewed and filled out by both parties before construction begins.
 - i. We must ask for significant maintenance guarantees— namely stormwater effluent test results starting with quarterly test periods during the first year, then (if results are acceptable) semi-annual testing in the second and third years and finally (if the program is found to be acceptable) continue on a semi-annual reporting basis from that point on. Test results are to be provided to Groton Utilities, with the provision that Groton Utilities water operations personnel will have the right (upon proper notification to the Owner) to retrieve their own samples for testing.
 - ii. The Owner must also show annual proof of contracts with vendors for the testing and maintenance of drainage facilities and provide a copy of such to Groton Utilities. Any deficiencies identified must be corrected within a period of one to three months and Groton will have the right to modify the testing and reporting intervals to such as may be deemed sufficient to ensure that repairs or improvements to the drainage facilities are functioning as intended. Testing protocols will be set up by representatives from Groton Utilities, the Owner or the Owner's designated representative (engineer or environmental professional). Payment for all testing, maintenance and the correction of any deficiencies will be the responsibility of the Owner.

b. Copy of Construction Stormwater General Permit from CTDEEP
(Disturbance acres is over 5 acres)

Response: Maintenance and testing will be performed in accordance with Town and State requirements. A copy of the General Stormwater Permit will be provided once approved by CTDEEP.

We appreciate the Inland Wetlands & Watercourses Commission's time and consideration of this application. We will continue to coordinate closely with Town staff and all reviewing agencies throughout the permitting process.

Should you require additional information, feel free to contact me at 203-608-2438 or khixson@blcompanies.com.

Sincerely,



Kevin Hixson
Senior Project Manager