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Land Use Department

Attachment**C.R. Klewin LLC**

**Ledyard Inland Wetlands and Watercourses Commission
19, 29, and 39 Military Highway (Map IDs 91/1590/19; 91/1590/29; and 19/1590/39)**

Application Narrative

This Narrative is in support of the application for a wetland permit (the "Application") submitted by KLEWIN C R -LLC (the "Owner" or "Applicant") for the properties known as 19, 29, and 39 Military Highway (Map IDs 91/1590/19; 91/1590/29; and 91/1590/39) (the "Property") in the Town of Ledyard, Connecticut (the "Town"). This Application seeks to permit the construction of up to 278 dwelling units within two multi-family residential structures and associated site improvements at the Property.

Overview of the Property:

The Property was formerly Sweet Acres Farm and is located on Military Highway just west of State Route 12. It is located within the GFDD (Gales Ferry Development District) zone where multi-family residences are permitted as of right with site plan approval by the Planning and Zoning Commission. Within a short walking distance of the Property are a pharmacy, public library, post office, restaurants and other retail stores.

The Project

This Application proposes the construction of two multi-family residential buildings, each with a 24,000 square foot footprint. Each building will contain 139 units, for a total of 278 units. In each building, there will be 91 two-bedroom units of approximately 900 square feet, 38 one-bedroom units of approximately 600 square feet, and ten studio apartments. This is a revision from previous plans which proposed more than 350 dwelling units in four buildings. The dwelling units have been designed so that two-bedroom apartments have two bathrooms, and one-bedroom units will have one and a half bathrooms. Each dwelling unit will have a balcony (except for studio units) overlooking the Property with views of the scenic uplands of Sweet Hill Acres from most units. A total of 387 parking spaces will be provided, eight of which will be accessible parking spaces. The Project is designed to attract professional staff currently seeking housing opportunities close to Electric Boat, Pfizer, the US Naval Base, and the casinos.

The proposed buildings and site improvements will not be located within inland wetland areas or the upland review area and no disturbance is proposed within the wetlands or upland review area. Minimal temporary disturbance will occur within the upland review area during construction. Drainage from outflows will flow into the wetlands.

IWWC Review Considerations (IWWC Regulations Section 10.2)

The Project complies with the IWWC Regulations criteria for decision as follows:

Consideration A: The environmental impact of the proposed regulated activity on wetlands or water courses.

Proposal consistent. No activity is proposed within wetland areas or the upland review area.

Consideration B: The applicant's purpose for, and any feasible and prudent alternatives to, the proposed regulated activity which alternatives would cause less or no environmental impact to wetlands or water courses.

Proposal consistent. The Project is a revision to a previous proposal that would have included more than 350 dwelling units in four buildings and improvements in the upland review area. The current proposal for 278 dwelling units in two buildings includes no development activity within wetlands or the upland review area.

Consideration C: The relationship between the short-term and long-term impacts of the proposed regulated activity on wetlands or water courses and the maintenance and enhancement of long-term productivity of such wetlands or water courses.

Criteria not applicable. The Project will have no long-term impacts on wetlands or watercourses.

Consideration D: Irreversible and irretrievable loss of wetland or watercourse resources which would be caused by the proposed regulated activity, including the extent to which such activity would foreclose a future ability to protect, enhance or restore such resources, and any mitigation measures which may be considered as a condition of issuing a permit for such activity.

Criteria not applicable. The Project will not result in an irreversible and irretrievable loss of wetland or watercourse resources.

Consideration E: The possibility of further avoiding reduction of the wetland's or watercourse's natural capacity to support desirable biological life, prevent flooding, supply water, control sedimentation and/or prevent erosion, assimilate wastes, facilitate drainage, and provide recreation and open space.

Criteria not applicable. The Project will not have any impact on wetlands or watercourses.

Consideration F: The extent to which the exercise of property rights and public benefit derived from such use may or may not outweigh or justify the possible degradation of the inland wetland or watercourse, the interference with the exercise of other property rights, and the impairments or endangerment of public health, safety or welfare.

Criteria not applicable. The Project will not have any impact on wetlands or watercourses.

Consideration G: Measures which would mitigate the impact of any aspect of the proposed regulated activity(ies).

Criteria not applicable. The Project will not have any impact on wetlands or watercourses. The anticipated minimal temporary disturbance of the upland review area will be immediately restored at the end of the construction project.