

To the Town of Ledyard Inland Wetlands & Watercourses Commission
October 28, 2022

Re: Application #IWWC22-18URA of Avery Brook Homes, LLC, 1641 Rte. 12, Gales Ferry, CT 06335 for URA activities associated with the siting of new single-family homes with associated grading and utilities on 9 of 36 lots in a proposed 8-30g Re-Subdivision located on 94,96,98 and 100 Stoddards Wharf Rd, Ledyard CT.

Groton Utilities has been made aware of this upcoming application to the IWWC and has previously reviewed the proposal with respect to plans and other materials submitted to the Planning and Zoning Commission. As there have been no noted changes to this proposal received by us to date, we continue to express our concerns with respect to the dense layout of homes, subsurface sewage disposal systems, wells and the private road passing through the subdivision without any design provision for drainage infrastructure or accommodation for stormwater renovation directly adjacent to a drinking water supply reservoir.

We are attaching a narrative and list of those concerns as presented to the Planning and Zoning Commission, Ledyard WPCA and ask that they be addressed in any upcoming proceedings. We have a duty to both local and regional consumers to protect the quality of our source waters; a clean and protected watershed is our first line of defense in this endeavor.

Please let us know if there are any questions or if any changes or updates to the proposal have been presented.

underlying groundwater and surrounding wetlands are directly linked to a drinking water supply that affects both adjacent towns and the Town of Ledyard.

(4) **Stormwater** – This issue has not been addressed with regard to the proposal. When viewed from a built out community, we see not only a significant density of housing, but a substantial increase of the area of impervious and landscaped cover leading to a high degree of stormwater surface runoff. This runoff from rainwater carries with it various substances from land within its watershed (i.e., the proposed subdivision) containing contaminants such as bacteria, parasites, viruses, and chemicals from lawn treatments and road and driveway surfaces, all harmful to human health.

A preliminary estimate indicates that the area of the road, driveways and houses represents 30% of the surface area of this proposed subdivision, not including landscaped areas. Combined with landscaped areas, we anticipate a significant amount of runoff directed not only toward downstream housing, but also immediately toward Groton Utilities property and the adjacent reservoir and wetland areas, without detention, renovation or treatment of any kind. As shown by currently available topographic information, stormwater runoff would be directed downslope through the development, over individual lots (between dense housing where structures are relatively close to each other) and over the interior road, directly toward adjacent wetlands. The runoff between houses would result in concentrated flow areas susceptible to erosive flows; resulting transport of sediment would then be directed to the adjacent property lines, wetlands and reservoir.

Rainfall, other than that resulting in direct runoff, will infiltrate into the ground and, based on percolation rates, make its way rapidly to the underlying water table which (as with surface runoff) is directed to the adjacent property and drinking water supply reservoir. Groundwater contributions to water supply are the least visible but important factors in the development and maintenance of a drinking water supply.

This again will be detrimental not only to the housing community, but also to our sources of drinking water supply. We urge that this issue be addressed and examined in detail through a definitive hydrogeologic and environmental impact study to ascertain flow directions, proper renovation of pollutants and future impact on water bodies, particularly with respect to nutrient loadings from both subsurface sewage disposal systems and the potential addition of fertilizers used for landscaping.

(5) **Land Clearing** – Due to the density of the proposed development, each lot will necessarily require near complete clearing of the entire subdivision site. Few, if any, natural areas would remain as a result of clearing and construction for the road on each lot, a house, driveway, well, septic tank, and leach field area for subsurface sewage disposal systems.