

EX#10

Please add this document to the official record for the public hearing on Ledyard Inland Wetlands and Watercourses Commission permit application (IWWC#25-19SITE) ("Lambtown Road Ext. culvert replacement with new custom inlet control structure at Ed Lamb Brook")."

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Land Use Department

November 12, 2025

To: Inland Wetlands and Watercourses Commission
Town of Ledyard
741 Colonel Ledyard Highway
Ledyard, CT 06339

Re: IWWC Application #25-19SITE ("Lambtown Road Ext. culvert replacement with new custom inlet control structure at Ed Lamb Brook").

For all of the reasons discussed herein, we urge the Commission to deny this application.

Thank you for your consideration.

Sincerely,

James C. Lamb Family Trust

By: Edmund Lamb
Edmund Lamb, co-trustee
47 Lambtown Road, Ledyard, CT 06339

By: Karen Lamb
Karen Lamb, co-trustee
34 Lambtown Road, Ledyard, CT 06339

Lamb Trust and Avery Nature Preserve Marsh and Bog

Critical Points:

- Must Maintain Water Levels Before, During, and After Culvert Replacement
- 38 Acres of Wetlands/Watercourses Directly at Risk

Significant Negative Project Impacts to Wetlands/Watercourses

- Will permanently lower water level in Marsh Complex by approximately 3 feet. (Proposed new culvert invert (floor) is 3 feet lower than open water surface level of Marsh.)
- Decreasing water elevation by only 0.5 feet will cause current water surface area of Marsh Complex to decrease from 21.0 acres to 11.5 acres. (LiDAR study)
- During construction Marsh water level will drain to bottom if coffer dam not used.
- Marsh bottom contours, bottom elevations, and flow rate information (not provided by applicant) are required to determine impacts of project on Marsh.

(Source: H+H Engineering Associates)

Environmental Value

- 38-acre Marsh Complex (open water, aquatic beds, vernal pools, emergent marsh, and bog) and associated wetlands
- Marshes of this size and character are less common and increasingly rare in CT.
- Pristine area with very limited invasive plants – very unusual in CT in this type of habitat.
- One of the most biologically diverse and valuable sites for conservation in eastern Connecticut.
- The Marsh area has numerous rare species
- Identified in the CT DEEP Natural Diversity Database

Environmental Value (con't)

- The connected 15-acre bog is a CT Critical Habitat (“twenty-five rare and specialized wildlife habitats in the state”). Requires the Marsh to have a minimum water level.
- 15 vernal pools at risk interconnected with the marsh along the perimeter
- Water level key to protect overwintering species
- Wintering birds require a large open water marsh
- Scenic value imperiled as the marsh is the key water feature along the Ledyard scenic road and a regional treasure

Environmental Value (con't)

- Marsh Complex has had huge open water area for many decades.
- Decades before beavers populated the area, water level was regulated by Avery and Lamb families, with agreement by then town selectmen. (one example: a wooden structure with slot in front where boards could be removed or added)
- For many decades water level has been feet higher than culvert floor level.
- Keeping a large open area of water in the marsh provided: habitat for birds and other animals, irrigation for farmland, water during droughts, and use for fire department.

Marsh Complex Documented Species

More than 168 bird species, 19 on CT list of endangered, threatened, or special concern species.

Shorebirds: Endangered: Pied-billed Grebe. Threatened: Great Egret, Snowy Egret. Special Concern: Little Blue Heron, Glossy Ibis, Common Loon. Other: Osprey, Great Blue and Green Heron, Kingfisher.

Wintering Birds: Bufflehead, Common Merganser, Red breasted Merganser.

Other Key Birds Benefitting from Marsh Complex:

Birds: Endangered: Blue-winged Warbler, Sedge Wren, American Bittern, Northern Harrier, Sharp-Shinned Hawk, Common Nighthawk, Yellow-breasted Chat. Threatened: American Kestrel, Peregrine Falcon. Special Concern: Bobolink, Brown Thrasher, Whippoorwill, Eastern Meadowlark, Broad-Winged Hawk

Birds in Greatest Conservation Need

Documented in Marsh Area

American Woodcock, Black-billed Cuckoo, Canada Warbler, Chestnut-sided Warbler, Eastern Kingbird, Eastern Towhee, Field Sparrow, Gray Catbird, Indigo Bunting, Magnolia Warbler, Northern Bobwhite, Orchard Oriole, Prairie Warbler, Veery, White-eyed Vireo, Willow Flycatcher, Yellow-billed Cuckoo

Turtles in Marsh Complex

- Box turtle – CT DEEP Species of Special Concern
- Spotted turtle – rare species
- Painted turtle
- Snapping turtle

Note: CT DEEP says the biggest threat to turtles is loss or damage of their habitat

Spotted and painted turtles hibernate through the winter underwater in the Marsh

Gives protection from predators

Critical to maintain water level

Fish and Amphibians in the Marsh Area

Fish: Banded Sunfish (CT Special Concern), American Eel, Chain and Redfin Pickerel, Common & Golden Shiner, Creek Chubsucker, Pumpkinseed.

Amphibians: Yellow-spotted Salamander, Wood Frog, Pickerel Frog, Green Frog, American Toad

Critical to maintain water level

Permits Required

- CT DEEP review – dam
- CT DEEP review – conservation easement
- CT DEEP and US review – vernal pools
- US Fish and Wildlife review – North American Wetlands Conservation Act conservation easement
- IWWC permit
- Ledyard Planning Commission – scenic road ordinance
- Landowner (Lamb Trust and GOSA) consent

Other Considerations

Studies required:

- Water and stream inflow/outflow rates and volumes
- Marsh bottom elevations, bottom contours
- Correct height, depth, placement of pipe
- Placement of pipe height key to ensure Marsh Complex is not drained and water levels remain the same
- Cofferdam placement
- Erosion control
- Soil types

