

**STATEMENT FROM JAMES MCCARTHY 95 STODDARDS WHARF ROAD  
PLANNING and ZONING COMMITTEE AUGUST 22, 2024**

Good Evening, well, here we are again, we have a new proposal from the applicant that on the surface seems to be a better option, but if you dig down is actually not any better but could actually be worse than the original proposal.

What you see are 18 units on a smaller footprint, but the density is the same if not worse than before.

. The Septic systems being used have not changed and the placement of the Septic systems in relation to the wells in the area are suspect. The technology of these systems are sound but the manufacturer recommends that the septic systems be cleaned frequently for them to work properly. Most people are unlikely to clean out their septic systems every two years, as suggested by the manufacturer and even though it is written in the covenants that the owners will do the maintenance, who will be enforcing it? Without the proper maintenance, these systems will fail and the water quality will suffer, it is quite possible it could cause a closure of the reservoir because of bacterial contamination. The applicant will also say that due to the sandy soil it is perfect for the septic systems to thrive, it is also perfect for the contaminants' to reach the aquifer in an expedient manner.

On site #1, the septic system may be within the 75 foot criteria for my well, no study has been completed to see if that septic system would affect this well and to see if the water flows down to my location. Well locations are also suspect throughout the site, two wells are consistently placed within feet of each other, well in lots 1&3, 2&4, and 15 , 17 are examples. If the owners of these lots decided to put small

above ground pools and try to fill them at around the same time, these wells would dry up affecting all other wells around them. The recharge time would be considerable. Is the well in lot 16 within the 75' septic threshold?

The well on lot 15 is directly over an old dumping ground that had debris from an old auto repair garage. Has the soil been tested for contaminants? Has the water for that well been tested? On lot 1, there was an asbestos ridden house along with lead contamination, when the house was taken down, there was no remediation done by the applicant, has the ground and water been tested? Has anyone checked the records to see if the construction debris was disposed of as hazardous waste as is required by law when asbestos is involved.

Let's talk about the drainage, the applicant will make us believe they went to great lengths to help control the runoff from this area to the surrounding wetlands and lots. On the surface, the idea of a downspout water containment system sounds pretty good. The Stormtech SC-740 seems to work well with parking lots as it was designed to. To work properly on a downspout system, the engineering of all the downspouts and drainage pipes have to be at the precise slope. Of course if water freezes in any of these locations it renders it almost useless. Blockage at any point could also prevent the containment system from working. The manufacturer of the SC-740 recommends that the containment vessel be power washed twice annually for it to remain functioning, do you see this happening? I think we would also like to know the capacity and drainage rates in laymen terms for these containment vessels. It should also be noted that though the vessels will hold solids, they do not remove contaminants like nitrates unless you add water treatment facilities prior to containment. The LBM report says they can handle the discharge of a one inch storm, but what happens when it goes above that? Can the gutter system handle 2 inch

an hour rainfall, or will there be spillover? The LBM Engineering report is based on the 2004 Storm Water Runoff Quality report. A 20 year old study! Based on the climate three decades ago! Does this standard meet the requirements of the current meteorological norms, where 2-4" rainfall an hour is the norm several times a year. We just witnessed what happened in western CT, and Vermont, in today's Boston Globe, there is a very informative article about the current climate issues we face in Connecticut, 100 year storms are now occurring every 20 years! It is likely that extreme precipitation events will increase in frequency. What happens when the containment systems are full or not functioning? Is it the developer's responsibility to repair or fix the issues and when buildout is complete are they still responsible?

According to the applicants, the driveways are now being constructed of gravel or stone to help facilitate the drainage of water into the soil, in two years these driveways will be rutted, muddy and in need of replacement especially the shared ones. A great solution for someone who has to buy an affordable house, now they have to pay for their septic to be cleaned frequently, the downspout containment system to be flushed twice annually, and now their driveway will need to be resurfaced every two years, very unlikely and very unaffordable!

On to the main drainage, again this is a Stormtech deep containment system. The applicant has two of these systems, one across the street from my neighbors next to lot two, and another at the rear of the development between lots 12 and 16. I could not find the capacity in gallons for either of these systems but I am sure they meet the state guidelines of handling a 1" storm, after that what happens? It all flows over the containment system? Last winter we had two four inch rainfalls back to back, how would these systems react? Especially if they are clogged with leaves and ice! It is interesting that the current plans show the diversion of all water near lots 1 – 6 go to a low point

(where the containment will sit) and no one seems to take into account the culvert that sits at the end of the system which drains under Stoddards Wharf Rd onto my neighbor's property directly towards his well. You could argue that culvert has been there for years, but now you have engineered over two acres or more of water along with the pollutants and nitrates to directly flow towards that point directly affecting my neighbor.

The same could be said for the other systems location, what is its capacity? There we have over three acres of water being directed towards one location. Nitrates galore with the lawn fertilizers and such. The applicant will argue that the covenants state that only specific fertilizers etc. will be used, and again who is enforcing this? The town of Ledyard does not have the capacity.

Another issue is that the applicant has designated that the Town of Ledyard is now has the responsibility to manage these new containment systems and will have the opportunity to clean these twice annually at taxpayer expense. If these systems fail who will be responsible? Something tells me it will be the environment and the taxpayer.

Other issues to ponder, why do we have to move the entrance of the development to directly across from my driveway? We will now have a dangerous 3 way intersection with no controls, traffic consistently goes 10 to 20 mph over the 30mph speed limit, again and we seem to say minimum a lot on this proposal, the sightlines for egress from the development meet the "minimum" state standards. Meaning that someone doing sixty mph down Stoddards wharf will hit you coming out of that road. I also get the added benefit of headlights raking across the front of my house every time a vehicle takes a right turn on to Stoddards Wharf Rd. Where will school busses pick up and drop off

children for this development? There are no sidewalks or waiting area. If this is approved.

A new traffic study must be done during the school year to properly study the traffic flow in the area, it has changed considerably in the past 4 years and should be repeated. Another request would be to have the developer at his own cost place electrical speed sign which alert vehicles of their speed in the area. Also I would like to see the snow removal plan for this cul de sac. I will not want the piles pushed over to my property.

I would also like to speak briefly about the false premise of affordable housing in this proposal, if you look at the applicant's numbers for costs and affordability, nothing has changed from their original proposal in 2022, it is all the same! Amazing when everybody else's costs have gone up 20%. I also question the benefit of adding what is essentially three affordable houses to the mix. The 80% house at approximately \$320000 already can be found listed around town so not exactly a bargain. The affordability plan also states a 5.62 adjustable rate mortgage, this rate is a little low looking at today's rates and these are not the mortgages you want people who are struggling to make ends meet have to pay. If you look at the terms, after the initial fixed rate, these rates can go up every six months for the rest of the mortgage term. The applicant may argue that at some point the owner can re finance their mortgage, but again that costs money.

We also have to look at the terms of the agreement to get someone into an affordable house, you must live in the house for 40 years before you get full equity. In my opinion, we have created indentured servitude for housing. And to add insult to injury, who has the honor of managing all of this in the future, The Town of Ledyard, they will have to add this responsibility to someone already overworked or hire

someone to manage the program, another drain on the taxpayer. I ask everyone on the committee to do a little research, recently the Boston Globe had a story on the affordable housing plan in Massachusetts which almost mirrors Connecticut's. In it the individuals that owned these houses were complaining and that they were unable to realize any gains to afford any new housing because of the restrictions in pricing.

In 2022, the prior proposal was denied by the Inland wetland water courses commission due to the danger that could occur due to pollutants from sewage, nitrates and chemicals which could endanger our water supply. This was upheld by facts and science. Unfortunately this year the commission could not review this application because of one word missing in the town's regulation. The current land is suited for no more than 4 houses because of the aquifer. This current proposal does not remove that issue or make it any better. At best the added containment systems are superficial Band-Aids which could be ripped off with one storm. The applicant will be constantly reminding us that this project is all about affordable housing and it is very important to build everywhere humanly possible to solve the current housing issues facing us. It doesn't matter if the aquifer being built on is responsible for the drinking water of over 40,000 people, and it is also the aquifer which supplies the water to the submarine base in Groton. I said it last time and I will say it again, who do you believe, the scientists for Groton water authority whose sole purpose is to deliver us safe water far into the future, or a developer whose main drive is certainly not affordable housing. I know this committee needs to make tough choices. The cries for affordable housing has reached a crescendo, rightly so. But, is it worth destroying the water quality of 40000 people for what is essentially three affordable houses. Thank you for listening and I urge you to vote No on this application.