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Land Use Department

Town of Ledyard
 Department of Land Use and Planning
 741 Colonel Ledyard Highway
 Ledyard, CT 06339

Attention: Elizabeth J. Burdick
 Director of Land Use & Planning

Re: Combined Response to Comments – 1947 Center Groton Road

Applications: PZ#26-3SITE and IWWC#26-7SITE

Applicant: EG Home, LLC

Dear Ms. Burdick:

We are in receipt of the Town of Ledyard Department of Land Use and Planning comments, Groton Utilities comments, Town Engineer comments, and Connecticut Department of Public Health comments for the above-referenced project. The comments are separated by source document below and restated, followed by a Response section for each item.

Section 1 – Land Use Director Comments

Miscellaneous Comments:

1. Revise plan to add any notes required by Groton Utilities. See Comments dated 4/23/26. Applicant states the plan set revised to 5/4/26 addresses said comments. Said revised plan shall be referred to Groton Utilities for further review and comment.

Response: Acknowledged

2. LLHD approval required for abandonment of two wells on the property. Applicant states it is working with LLHD to start to coordination of the abandonment of the two wells. Final abandonment of wells shall be a condition of any favorable approval.

Response: Acknowledged

3. Emergency spill plans shall be provided as part of the application. See GU watershed comment #4 & #5. Applicant states: “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.” GU shall confirm same.

Response: Acknowledged, applicant agrees these conditions will not exist.

4. GU recommends MOU between it and new site owner. See watershed comments #6.a.i & ii. Applicant states: "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." GU shall confirm same. Comment addressed. DEEP Construction Stormwater General Permit required for 5- acres+ of soil disturbance prior to issuance of zoning permit to start work. Condition of any favorable approval – evidence of CT DEEP approval and issuance of General Permit shall be submitted to Zoning Official prior to the issuance of a Zoning Permit to start work.

Response: Acknowledged, CT DEEP approval letter will be provided once available.

Application:

1. Preliminary comment addressed.

Cover Sheet (G0.00): Preliminary comments 1-2 addressed.

General Notes (G0.01): Preliminary comments 1-5 addressed.

Existing Conditions Survey (EX-1):

1. Outstanding. Applicant's Title Attorney shall provide a legal opinion regarding "rights" of others for former "Niles Road (Old Center Groton Road)" as shown on existing conditions survey as portions of said area shown on the survey are proposed for buildings. Applicant's attorney may opine, as well.

Response: Niles Road is abandoned roadway, resulting from the relocation of Connecticut Route 117 to the east. The status of Niles Road as abandoned was confirmed by the unanimous affirmative resolution of the Ledyard Town Council on February 24, 2010 and after a positive CGS 8-24 referral to the Ledyard Planning & Zoning Commission on November 5, 2009. Niles Road no longer physically exists, is no longer passable, is completed revegetated with mature forest, and the Town of Ledyard no longer maintains it or shows it on its town road map.

2. Further comment. Will the Developer grant an easement to #1939 Center Groton road for encroachments (Shed, Driveway) over #1947? Applicant states: A future lot line revision is proposed to address the encroachments from 1939 Center Groton Road. The portion of property with the encroachment will be transferred to 1939 Center Groton Road." Applicant shall submit the lot line adjustment plan with zoning compliance table for both lots as part of the application for review and approval by Land Use Dept. staff and LLHD. Any lot line adjustment plan shall be filed prior to the filing of the site plan as a condition of any favorable approval.

Response: A Lot Line Revision Plan is included with this submission.

Demolition Plan (C0.00):

1. Preliminary comment addressed.

2. Preliminary comment addressed. L.S. shall flag in field in some manner prior to the start of work as a condition of any favorable approval.

Response: Acknowledged

3. Preliminary comment addressed. “CHD Disk in Ledge in southeast portion of property along frontage to be replaced per CT DOT requirements. Condition of any favorable approval – evidence of all work in State of CT Right of Way approved by CT DOT shall be submitted to the Zoning Official prior to the issuance of a Zoning Permit to start work.

Response: Acknowledged, applicant is in the process of CTDOT approval. Final approval will be provided once received.

Site Plan (C1.00):

1. Outstanding - preliminary comment not addressed. Discussion comment: Sidewalks should be proposed along the front boundary line in its entirety or, in the alternative, continued through the property to connect to adjacent property. A public access easement would be required to allow foot traffic over #1947.

Response: Applicant will address this topic at the next meeting.

2. Preliminary comment addressed.

3. Preliminary comment addressed.

4. Partial preliminary comments addressed. Emergency access drive revised to propose gravel (v. grass pavers) and detail provided. Fire Marshal/Fire Chief shall approve emergency access surface. Outstanding – provide detail for paver patios for individual homes.

Response: Patio areas have been changed to gravel pads.

5. Preliminary comment addressed.

6. Preliminary comment addressed.

7. Preliminary comment addressed.

8. Preliminary comment addressed.

9. Preliminary comment addressed.

10. Preliminary comment confirmed.

11. Preliminary comment addressed. Parking space size of 16’ x 20’ (typ.) shown on plan is proposed to add additional space. Ok.

12. Preliminary comment confirmed and revised. In addition to proposed 2 parking spaces per unit, 32 additional parking spaces are proposed (total 176 spaces). Ok.

13. Preliminary comment addressed. Eight (8) accessible units are identified on plan.

14. Preliminary comment confirmed. Condition of any favorable approval – evidence of all work in State of CT Right of Way approved by CT DOT shall be submitted to the Zoning Official prior to the issuance of a Zoning Permit to start work.

Response: Acknowledged, applicant is in the process of CTDOT approval. Final approval will be provided once received.

Grading Plan (C2.00), Drainage Plan (C2.50), Grading and Details Sheets (C2.100, C2.101, C2.102) :

1. Preliminary comment confirmed. Review and approval by the Town Engineer required.

Response: Acknowledged

2. Preliminary comment addressed re “substantial grading is proposed to property lines.” Applicant states no temporary easements be required from adjacent property owners to achieve same. Further comment. Silt fence is shown on property line and grading is shown to property line. Any encroachment onto adjacent properties to achieve SESC’s or grading will be a violation of future approved zoning permit if temporary easements are not obtained.

Response: Acknowledged

3. Preliminary comment confirmed. Staff to confirm status of drainage structures proposed at south property line with Town Engineer.

Response: Acknowledged

Site Utilities Plan (C3.00) and Site Utilities Details (C3.100):

1. Preliminary comment addressed – “Coordination is ongoing” -

Erosion & Sediment Control Plan (C4.00) and Erosion & Sediment Controls Notes (C4.100):

1. Preliminary comment addressed.

2. Preliminary comment addressed “We have reviewed the Planning & Zoning Regulations and were unable to find any reference to 3:1 slopes” >3:1 slopes proposed. Staff to review further.

Response: Acknowledged, slopes 3:1 or greater have erosion control blankets proposed for slope stabilization. This is shown on the Erosion Control Plan (C4.00).

3. Preliminary comment noted. Spoil & Borrow - Note 11. Staff to review with Town Engineer.

Response: Acknowledged

4. Not addressed. Preliminary comment noted as follows: “Inspections should be conducted in accordance with DEEP Construction Stormwater General Permit at a minimum frequency of weekly.” Staff recommends bi-weekly. Revise Sediment Control Note 15 to comply with staff recommendation.

Response: Note 15 under the construction sequence and note 4 under the sediment and erosion control notes have been updated to “twice weekly”.

5. Preliminary comment addressed.

6. Preliminary comment addressed.

7. Preliminary comment addressed.

8. Preliminary comment addressed “We have reviewed the Planning & Zoning Regulations and were unable to find any reference to 3:1 slopes.” >3:1 slopes proposed. Staff to review further.

Response: Acknowledged, slopes 3:1 or greater have erosion control blankets proposed for slope stabilization. This is shown on the Erosion Control Plan (C4.00).

9. Not addressed. Preliminary comment noted as follows: “Inspections should be conducted in accordance with DEEP Construction Stormwater General Permit at a minimum frequency of weekly.” Staff recommends bi-weekly. Revise Sediment Control Note 15 to comply with staff recommendation.

Response: Note 15 under the construction sequence and note 4 under the sediment and erosion control notes have been updated to “twice weekly”.

10. Not addressed. Preliminary comment noted as follows: “Inspections should be conducted in accordance with DEEP Construction Stormwater General Permit at a minimum frequency of weekly.” Staff recommends bi-weekly. Revise Sediment Control Note 15 to comply with staff recommendation.

Response: Note 15 under the construction sequence and note 4 under the sediment and erosion control notes have been updated to “twice weekly”.

11. Preliminary comment addressed – Bond estimate pending. Sediment and Erosion Control Notes – Note #3 - Erosion and sediment control bond estimate shall be submitted for review & approval by the Town Engineer.

Response: Erosion control bond will be provided for approval once available.

12. Not addressed. Preliminary comment noted as follows: “Inspections should be conducted in accordance with DEEP Construction Stormwater General Permit at a minimum frequency of weekly.” Staff recommends bi-weekly. Revise Sediment Control Note 15 to comply with staff recommendation.

Response: Note 15 under the construction sequence and note 4 under the sediment and erosion control notes have been updated to “twice weekly”.

13. Preliminary comment addressed.

14. Not addressed. Preliminary comment noted as follows: “Inspections should be conducted in accordance with DEEP Construction Stormwater General Permit at a minimum frequency of weekly.” Staff recommends bi-weekly. Revise Sediment Control Note 15 to comply with staff recommendation.

Response: Note 15 under the construction sequence and note 4 under the sediment and erosion control notes have been updated to “twice weekly”.

15. Preliminary comment confirmed. Condition of any favorable approval – evidence of CT DEEP approval and issuance of General Permit shall be submitted to Zoning Official prior to the issuance of a Zoning Permit to start work

Response: Acknowledged, applicant is in the process of CTDOT approval. Final approval will be provided once received.

16. Preliminary comment addressed.

Landscaping Plan (C5.00), Landscape Plan Enlargement (C5.01 & 5.02), and Landscaping Notes and Details (C5.100):

1. Preliminary comment addressed.

2. Preliminary comment noted – Staff Need to check plant/tree species for appropriateness.

Response: Acknowledged

3. Preliminary comment noted - Condition of Approval. The developer shall submit a site completion landscaping bond to insure same.

Response: Acknowledged

4. Preliminary comment addressed.

Lighting Plan (C6.00), Lighting Notes & Details (C6.100):

1. Preliminary comment noted.

2. Preliminary comment noted - Consideration will be given to matching lighting style in Ledyard Center. Commission should strongly consider.

Response: Lighting proposed has a similar style to lighting within Ledyard Center.

3. Preliminary comment addressed. New comment – what are the squares shown on individual patios areas?

Response: square next to patio areas are for ground mounted air conditioning equipment.

Ledyard Zoning Regulations Sections:

1. Preliminary comment addressed.

2. Preliminary comment addressed. One snow storage area noted on plan. Response comment indicates “areas.”

Response: Multiple snow storage areas are noted on the plans. Please refer to the site plan (C1.00)

3. Preliminary comment addressed.

4. Preliminary comment addressed.

5. Preliminary comment addressed - Temporary stone crushing will take place during construction in accordance with Section 7.10. Advise days of week & hours this work will take place on site. Further staff review required.

Response: Acknowledged

6. Preliminary comment addressed.

7. Preliminary comment addressed in writing per ZR Sec. 9.2.A-E (Sustainable Development) as follows: "The development has been thoughtfully designed to maximize energy efficiency by aligning roads along an East/West orientation, allowing designated solar array locations to achieve greater than 80% Total Solar Resource Fraction (TSRF) for optimal solar performance. All units are engineered to meet U.S. Department of Energy (DOE) EV Ready and PV Ready standards, ensuring they are fully equipped for future electric vehicle charging and solar installations. In addition, each home is designed to meet the requirements for DOE Zero Energy Certification, significantly reducing overall energy consumption and supporting long-term sustainability."

8. Preliminary comment addressed. 2 spaces per unit proposed (one garage, one oversized outdoor) and 32 extra parking spaces provided.

9. Preliminary comment addressed.

10. Preliminary comment partially addressed. Revise plan to show painted areas or center line to show site circulation.

Response: Stripped parking areas are shown around the site and the entrance drive center line has been extended the entire length of the entrance.

11. Preliminary comment partially addressed. Accessible outside parking spaces shall also be shown for accessible units (v. just inside garage). Contact staff with questions.

Response: Accessible space is provided at the mailboxes.

12. Preliminary comment addressed. Individual containers for each unit will be located in garages for curbside pickup. Town refuse collection provided for individual homeowners. Applicant shall contact Town's refuse provider CWPM to insure it will be able to manage pickup at each driveway as configured on the plan. Staff will forward contact information to Applicant.

Response: Acknowledged

13. Not Addressed. Preliminary comment addressed as follows: "This information will be in the homeowners association documents." Also, add note to plan there shall be no outdoor storage at the site other than those used for a typical residence, i.e. patio furniture, grills, etc.

Response: A note has been added to the site plan on sheet C1.00.

14. Preliminary Comment addressed in part as follows: "The proposed development has been carefully designed to advance the intent of Sections 9.9.1–9.9.3 to the greatest extent practicable—including architectural compatibility, preservation of natural and historic features, and adherence to development district design objectives—while also maintaining an efficient,

functional, and cost-effective site layouts.” Applicant needs to provide separate written narrative addressing individual sections.

Response:

9.9.1 - A Phase 1B archaeological reconnaissance survey was completed for the subject property in accordance with applicable state guidelines. The investigation included systematic subsurface testing and evaluation of site conditions. Based on the results of this survey, no archaeological resources or sites of historical significance were identified within the project area.

9.9.2 - All reasonable and practicable measures have been incorporated into the project design to balance traditional New England architectural character and materials with cost and attainability for the future townhomes. The design avoids the use of discouraged materials such as unfinished concrete, concrete block, and asphalt siding on visible facades.

The building massing has been carefully designed to reduce the perceived scale of larger structures with varied rooflines and articulated facades. Multiple elevations will be offered to increase the variation between buildings.

The overall architectural composition has been developed to relate harmoniously to the surrounding built environment. Roof forms, materials, and building proportions are consistent with those found in the surrounding district and structures. Accordingly, the proposed development is consistent with the intent of these design guidelines.

9.9.3 - The design of proposed structures, parking areas, accessways, and landscaping is compatible with the site’s natural features and existing topography. The layout has been carefully planned to minimize disturbance to natural conditions while maintaining functional and safe circulation patterns.

Sidewalks are provided in accordance with the minimum five-foot requirement. Building placement has also been considered in relation to the public realm, with structures positioned to the extent practicable to reinforce the streetscape and support a pedestrian-oriented environment.

15. Preliminary comment noted - Consideration will be given to matching lighting style in Ledyard Center.

16. Preliminary comment addressed.

17. Preliminary comment addressed.

18. Preliminary comment addressed.

19. Preliminary comment not noted, but ZR Sec. 11.2.1-11.2.8 (Submission Requirements) shall apply to this application.

Response: Acknowledged

Staff Recommendation: Further LUD application review pending (traffic study, additional Town Staff comments, et al). Any further comments will be provided to the Applicant on

or before 6/22/26. Recommendation is reserved at this time pending all staff/agency reviews and any required plan revisions.

Section 2 – Groton Utilities Comments

1. 2026-05-06 (1) Rain Gardens - There are 2 rain gardens and 2 rain garden details, but no apparent indication of which detail applies to which garden, RG-1 or RG-2. Also, one detail (on C2.101) refers to a 3" underdrain and one (C2.102) refers to a 4" underdrain, whereas both callouts on the drainage plan indicate 4" drains. Note that drains do not show inverts.

Response: Details have been updated to clarify. One detail is for the bioretention area and the other detail is a typical rain garden detail.

2. (2) Roof Drain Discharges - There is a substantial number of apparent roof drains discharging away from the rear side of the buildings, and while swales are shown by contours and grading, there is no defined swale detail for those shown on the drainage plan, nor do there appear to be any specific references thereto in the Stormwater Management Report. Swales on the southwest side adjacent to the property line appear to be disconnected from the detention basin at the westerly end (see proposed contour 263), seeming to partially discharge onto the neighboring property to the south without entering the detention area. One section in particular, at the central drainage divide, between Buildings 2 and 3, has a steeply graded swale at 3H:1V. We would posit that this a rather severe grade and highly erodible for a grass swale during a severe storm event.

In addition, discharges from the central building section (including flow from Buildings 10 to 17, encompassing 34 roof units) appear to be directed toward a single swale at the back of the buildings, from east to west, ending in a single catch basin entry point at the west end of the last set of buildings. Is one single catch basin sufficient in this area to prevent bypass flow during severe storms? It appears from the delineation of contributory areas on page PDA-1 that roof runoff from Bldgs. 12 and 13 is directed to PDA-21, whereas the delineation includes these two buildings in PDA-41. Likewise, roof drainage from Buildings 3 and 4 appears to be directed toward the southerly property line, while the buildings are included in PDA-41. This should be clarified, as well as any impact to the Water Quality Volume calculations.

Response:

Roof drain piping has been added to the rear of the buildings 1-5 to ensure routing to treatment areas.

Gutter spread calculations have been provided in Appendix E of the stormwater report. In the 25-year storm ponding around this catch basin is present but any bypass of flow will be captured by catch basins down slope and will be routed to the treatment areas.

Please see the revised PDA-1 drawing for updated contributory area delineations. Delineations have been updated to reflect roof drain routing per the building design.

3. (3) Soil Test Pits - The locations of these pits does not appear to be shown on the plans, including the three pits used for infiltration testing. Also, were groundwater observations monitored over time, or just on the occasion of the excavations?

Response: Approximate soil test pit locations have been added to the grading plan (C2.00).

4. (4) Drainage Report / Runoff Quantity Control - The statement for the 2-year post development period under "Standard 2" appears to be incorrect, given the caveat below the list of pre- to post-development statements.

Response: Standard 2 has been updated to note the portion of the requirement not being met.

5. (5) Post-Construction Operation & Maintenance - The report indicated that this would be forthcoming under separate cover. It is important that we review this document to ascertain its conformance to our Memorandum of Understanding with respect to post-construction monitoring and adherence to required maintenance.

Response: An operation and maintenance plan is provided for review with this submission.

Section 3 – Town Engineer Comments Stormwater Management Report

1. Page 10: The report was updated elsewhere to reflect Ledyard Drainage Ordinance compliance, but not under 2.1 Design Criteria. Also, this goes for the compliance with a 25-year storm under STANDARD 2.

Response: Section has been updated to reference the stormwater ordinances and 25-year storm requirement under standard 2.

2. Page 15; POST-DEVELOPMENT HYDROLOGIC CONCLUSIONS: The 100-Year Storm Post-Development value for DP-3 (0.05) does not correspond to the calculated value given in the analysis (0.48). The total should also be changed from 19.42 to 19.85.

Response: Peak flow chart has been updated per the revised stormwater analysis.

3. Page 17; SITE DESIGN SUMMARY: The applicant is seeking a waiver to the 2024 Connecticut Stormwater Quality Manual stipulation concerning the 50% reduction in the post-development peak 2-year storm flow. The applicant has revised provisions to improve the reduction to 29%, nearly doubling it. Though the Commissions have the ultimate say, I feel comfortable with this within the extended context of significant reductions through the entire range of lower-frequency storms.

4. APPENDIX E; CONVEYANCE MODELING RESULTS

a. There is widespread (virtually universal) divergence in the pipe invert elevations cited versus those given on the plans (see sheet C2.50); the plans seem to be correct. This is an original comment that was not resolved and is too extensive to delineate in full detail. The Applicant should ensure a comprehensive review is conducted to ensure correspondence of value in all cases.

Response: Invert elevations shown on the conveyance modeling profile refer to the bottom of the structure.

- b. The initial summary "FlexTable: Catch Basin" and "Catchment" tables are illegible as printed.

Response: Table have been reprinted and checked for legibility.

- c. Additional Specific Issues

- 1) Engineering Profile - CB-208 TO MH-200: Pipes 99 and 100 are shown as 18"; the plans show 15".

Response: Pipes have been updated to match on the plans.

- 2) Engineering Profile - CB-410 TO FES-400

- a) Pipes 84 and 103 have lengths and slopes that do not match the plans.
b) The rim elevations for MH-401 and CB-401 do not match the plans.

Response: Pipe lengths and rim elevations have been updated to match on the plans and modeling results.

- 3) Engineering Profile - CB-207 TO FES-200: Two pipes are designated "100." In each case 30" is cited, whereas the plans show 24".

Response: Plans have been updated to 30".

- 4) Engineering Profile - CB-405 TO CB-404: The rim elevation shown is 277.67; the plans show 277.17.

Response: The plans and report have been updated to match. Refer to Appendix E for updated modeling results.

- 5) CB-408 TO OCS-4B

- a) "OCS-4B" should be "CB-411."
b) In the diagram, "CB-403" should be "CB-408."
c) The rim elevation depicted for CB-408 should be 274.50.

Hydrologic Modeling: May need to be rerun to conform to any changes that are material to it.

Response: The noted items have been updated. Refer to Appendix E for updated modeling results.

Section 4 – Connecticut Department of Public Health Comments

1. Erosion and sedimentation controls (ESC) measures should be consistent with the Connecticut Guidelines for Soil Erosion & Sediment Control, installed prior to disturbance, maintained throughout construction, and kept in place until disturbed areas are fully stabilized. All clearing, grading, excavation, utility installation, road construction, retaining wall and drainage work, particularly in the upland review area, should be managed to minimize the extent and duration of exposed soils and prevent sediment-laden runoff from reaching adjacent wetlands, drainage features, and stormwater structures. ESC should be inspected regularly and

after significant precipitation events, with immediate corrective action where deficiencies are observed.

Response: Acknowledged

2. Any dewatering associated with excavation, utilities, or drainage installations should be controlled, filtered as needed, and discharged in a manner that prevents erosion and avoids direct discharge to sensitive drainage pathways. Stable vegetated cover should be installed over disturbed areas as soon as practicable. All grading and drainage features should preserve or enhance the Location's pollutant attenuation and infiltration capacity and should avoid creating concentrated, erosive discharges toward the Reservoir watershed drainage network.

Response: Acknowledged

3. The Stormwater Management system should be consistent with the Connecticut Stormwater Quality Manual and with the most recent Stormwater Report and plans accepted into the municipal record, including revisions made in response to GPU, the Ledyard Water Pollution Control Authority (WPCA) and the Town's comments. The proposed stormwater controls and conveyance structures should be designed, installed, maintained, and protected during construction to prevent clogging and loss of function.

Response: Acknowledged

4. DPH notes GPU's concern that the majority of stormwater roof runoff appears to be directed to one swale on the western side of the Location with limited catch basins and the potential to discharge toward the Reservoir, and that the currently proposed treatment may be insufficient for the Project size. Final stormwater design should demonstrate that runoff from roofs, roads, parking areas, and all other developed portions of the site will be adequately captured, treated, attenuated, and discharged in a manner that avoids untreated or under-treated flow toward downgradient swales, wetlands, or other drainage features tributary to the Reservoir.

Response: Roof drain piping has been added to the rear of the buildings 1-5 to ensure routing to treatment areas. All developed portions of the site are directed to a treatment practices before discharge offsite.

5. DPH supports GPU's request for additional protective stormwater drainage and treatment measures as necessary, including consideration of an underground treatment chamber, as necessary, to address remaining drainage and treatment concerns identified during municipal and utility review. DPH recommends that these concerns be resolved prior to Town approval and supports GPU's recommendation that a Memorandum of Understanding (MOU) be executed between GPU and the future owner to ensure ongoing compliance through maintenance of stormwater facilities consistent with a Stormwater Maintenance Plan. A copy of the Connecticut Energy and Environmental Department (DEEP) Construction Stormwater General Permit and associated compliance documentation should be obtained and provided to the Town and GPU prior to commencement of land disturbance.

Response: Acknowledged, there are two proposed hydrodynamic separators for treatment as well as two rain gardens, a bioretention basin, and two stormwater detention basins.

6. All water and sewer main installations should be accurately reflected in site plans. Piping must be installed in accordance with state, local and utility requirements. As a general recommendation, water and sewer mains should, whenever possible, be at least 10 feet apart, and crossings should maintain at least 18 inches of vertical separation. It should be strictly prohibited that sanitary overflows, bypasses, or discharges reach wetlands, stormwater systems, or adjacent drainage features.

Response: Acknowledged

7. The Applicant should develop an operations and maintenance plan (O&M) that includes routine inspection schedules during construction, after significant weather events, and for the life of the Project to verify the performance of ESCs, stormwater and stabilization measures. The O&M plan should define sediment and debris removal triggers, identify responsible parties, and include timely corrective actions.

Response: An O&M plan has been included with this submission.

8. Contaminant loading of fertilizers, herbicides, pesticides, pet waste, petroleum products, and winter maintenance materials associated with high-density residential use should be minimized. Landscaping should prioritize Low Impact Development (LID) measures to the maximum extent practicable. Winter maintenance practices should minimize chloride loading through calibrated application and proper storage and handling of deicing materials.

Response: No fertilizers, herbicides, pesticides, petroleum products, and winter deicing products will be stored on site. The proposed plan implements multiple LID practices including rain gardens and a bioretention basin.

9. The Applicant should prepare and implement a Spill Prevention and Response Plan addressing equipment maintenance, fueling, chemical handling, and construction activities. Spill kits should be maintained on site and staff should be trained in spill prevention and response. Fueling, equipment maintenance and chemical storage should occur only outside of sensitive drainage features in designated, controlled, impervious areas with secondary containment and measures to prevent mobilization of contaminants to wetlands or stormwater systems.

Response: A spill control section is included in the O&M Plan.

10. The Project should be constructed in accordance all applicable Town, WPCA and GPU conditions reflected in the municipal record. Prior to construction, the Applicant should provide these entities with the final site plans, including final stormwater, ERC, O&M, Spill Prevention/Response plans, all enforceable protective measures, and a 24-hour emergency contact. During construction, these entities should be afforded reasonable access at key construction milestones and periodically thereafter to observe site conditions relevant to protection of the Watershed.

Response: Acknowledged.



We trust that the above responses will address the comments provided. Please contact us if additional information is required.

Sincerely,

Kevin Hixson
Senior Project Manager
BL Companies