

EX-128  
LW @ 11/7  
9/3/24

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Ms. Liz Burdick & Members of Inland Wetlands and Watercourse Committee  
Town of Ledyard  
Ledyard, CT 06339

My name is Julie Dupont-Woody of 770 Long Cove Road Gales Ferry. Today I am here as a representative of Avalonia Land Conservancy. Avalonia is an abutter of this proposed development. Avalonia Land Conservancy owns and maintains the adjacent pond and wetlands known as Cranberry Pond. Cranberry Pond Preserve is 5.45 acres containing a 2.86 acre pond. Nearly all of the land of the Preserve is wetlands and lies within the 100 year flood plain of Pine Swamp Brook. The area is an significant watershed leading to the Thames River and is an active habitat for a variety of birds, small mammals, reptiles including many turtles, and amphibians.

First, Avalonia is concerned with the wetlands boundaries. We would like to understand where the test pits for the wetlands delineation were made and how many were dug? The survey was performed in November - which is a very dry month. As you know, there is a long wetlands boundary on that property and it appears that the wetlands boundary was determined mostly by soils type and is essentially the edge of the water. As noted in the soils survey, the wetlands were "flooded due to active beavers and downstream blockage, causing the water levels of Pine Swamp Brook to rise." Avalonia would like it noted in the record that this is quite common as the Cranberry Pond preserve is a significant natural area, the presence of beavers is or other blockages is highly likely and flooding will very likely reoccur. Per the Cranberry Pond Management Plan, Avalonia will make no attempt to clear or eradicate beavers or otherwise interfere with the natural habitat. Avalonia is requesting a re-determination of the wetlands boundaries during the wet season to ascertain the current actual wetlands boundary.

Avalonia is also concerned with the both the volume and contamination of run-off from the impervious surfaces (parking lot and roof of the development) and the proposed water-treatment facility discharge. The storm-water retention in the development packet was designed for 1.3" of rain. The facts are that Gales Ferry has exceeded this amount with more than 2" of rain at least 1 day every month at least for the last 5 months, including 4" of rain on May 16th. In addition the water and automotive fluid pollutants from cars in the parking lot, the proposed sewer treatment plan is a large, complex, and largely unstaffed system that to my knowledge has never been used or proven in New Land County in a residential setting. This system is permitted to release another nearly 53,000 gallons a day of water discharged as subsurface waters, which will ultimately make their way towards the Cranberry Pond watershed. The volume of water alone is constitutes a significant change in the amount of

water currently processed the by Cranberry Pond and the adjacent wetlands. What is the condition and quality of the resulting non-potable water discharge? What chemicals are being used to treat this water? What is the nutrient load in the released subsurface water? The proposed sewage treatment facility is largely unstaffed relying on remote monitoring. What is the plan when an alarm sounds indicating failure of the treatment facility, high turbidity, lack of UV disinfectant, mercury from UV lamp breakage, high fecal coliform or other alarms? The state of CT does NOT require notification when a discharge does not represent a public health hazard, however these discharges can still cause a significant adverse issue to the waters and habitat of Cranberry Pond leading to high nitrogen levels and ultimately to algae growth and reduced dissolved oxygen. We would like to understand how long contaminated water can flow into Cranberry Pond and the Pine Swamp Watershed without our knowledge when a system failure occurs? We are also requesting notification and testing when alarms for contaminants such as high turbidity, total suspended solids, and fecal coliform etc. are potentially discharged into the wetlands of Cranberry Pond watershed and we are requesting additional information on how the developer proposes to mitigate any significant intrusion of contaminated run-off and discharges into our watershed when a system failure occurs.

Finally, the developer is proposing the use of a conservation seed mix after construction. In our experience, construction activities around our preserves introduces a significant amount of mugwort and fragmites 100% of the time, despite the use of “conservation seed mix” and the removal of these invasive is time consuming. The presence of these invasive plants further degrades our wetlands and habitat. Avalonia would like to understand who will maintain the conservation seed mix and landscaping at the proposed development to ensure the continued cultivation of native species and who will be responsible for mitigating the eventual intrusion of invasive from the construction project.

Regards,  
Julie Woody  
Chair, Avalonia Ledyard Town Committee  
Julie

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