



GROTON UTILITIES

At Your Service

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LAND USE DEPARTMENT

March 6, 2023

To Whom It May Concern:

As the Director of the Department of Utilities for the City of Groton ("Groton Utilities" or "GU"), I appreciate this opportunity to inform you of GU's strong opposition to the current proposal by Avery Brook Homes, LLC to construct 26 single family homes directly adjacent to, and in very close proximity to, the Billings Avery Reservoir on Stoddards Wharf Road in Ledyard.

Various studies and reports have demonstrated the correlation between land development and water quality degradation, and many conclude that one of the simplest methods for the protection of public drinking water sources is to limit residential development to a maximum density of one dwelling unit per two acres of buildable area.

In particular, I refer you to Figure 3 in the report entitled the Drinking Water Assessment and Source Protection Program which ranks risk to drinking water sources posed by different types of land use categories. A copy of Figure 3 is attached to this letter. A copy of the full report can be found on the website of the Connecticut Department of Public Health.

Figure 3 lists "low-density residential housing on 2-acre lots" among the second lowest risk categories and "high density housing on less than 1/2 acre lots" among the second highest risk categories.

The current development proposal, i.e. to situate 26 homes [with 26 underground septic systems] on lots of approximately 1/3 acre within a few hundred feet of watercourses and wetlands which are a source of public drinking water, is a high risk proposal.

The Plans of Conservation and Development of both the State of Connecticut and the Town of Ledyard list the protection of public drinking water sources as an objective of prime importance to the health and economic well-being of the residents of Connecticut and the town.

Indeed, protecting the "quality of wetlands and watercourses for their conservation, economic, aesthetic, recreational and other public and private uses and values" and protecting "the state's potable fresh water supplies from the dangers of ... pollution" are two of the express purposes of the Inland Wetlands and Watercourses Act (CGS § 22a-36 et seq).



There is substantial evidence that the proposed development will pollute Billings Avery Pond, a public water supply reservoir, and its associated wetlands and feeder streams due to septic-system effluent, stormwater runoff and construction sedimentation. Such concerns are not theoretical or abstract, but certain, and will result in the degradation of a significant source of drinking water for the Southeastern Connecticut Region. The effects of pollution on drinking water supplies is cumulative and needs to be avoided whenever and wherever possible.

There is obviously a feasible and prudent alternative to this proposal which can be designed to have little or no adverse impacts to the wetlands and watercourses which constitute the reservoir, i.e. to reduce the level of development to one which is consistent with state and local policy and will protect a critical public asset.

I thank you for the opportunity to comment on this project and ask that you help Groton Utilities protect the public drinking water supply by denying this proposal.

Very truly yours,

GROTON UTILITIES

Ron Gaudet
Director of Utilities