



TOWN OF LEDYARD
CONNECTICUT
OFFICE OF THE MAYOR

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November 12, 2024

Ledyard Inland Wetlands and Watercourses Commission (IWWC)

Attn: Justin DeBrodt

741 Colonel Ledyard Hwy.

Ledyard, CT 06339

RE: IWWC #24-10RA

Chairman DeBrodt,

I have reviewed the application to amend the Ledyard IWWC regulations and offer the following:

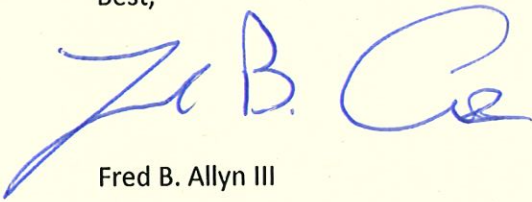
1. **Modify Section 2.1.** The last sentence in the definition of "Regulated activity" is problematic. "The IWWC may rule that any other activity located within such upland review area or in any other non-wetland or non-watercourse area is likely to impact or affect wetlands or watercourses and is a regulated activity." This suggests that the existing 100' upland review area is insufficient. Has a data-backed determination been rendered as to the existing regulations insufficiency? Do empirical examples exist that support this revision? Further, should this proposal come to pass, will this require every land use application (including pools, decks, sheds, and any project that contains impervious surface) to seek an IWWC permit?
2. **Modify Section 7.5b.** Proposed language reads "Sewage or water drainage from the project site will flow through and impact the sewage or drainage system within an adjoining municipality..." This too is troublesome. In referring to wastewater (effluent), it is not only customary, but regulated by CT DEEP in terms of how the effluent flows. As an example, the Ledyard WPCA flows into Williams Brook, which becomes the Whitford Brook and onto the Mystic River. In this

case, traversing multiple municipal jurisdictions. It should be noted that Sewage treatment plants in Norwich, Montville, Groton, New London and Stonington all flow into brooks and/or rivers before entering Long Island Sound. It is customary to have these facilities on or near a waterway to allow the effluent to enter those waters.

3. **Modify Section 7.8.** A permit shall be granted a renewal, unless the IWWC finds that there has been a "substantial change in circumstances"? What/ Who qualifies this latter language?
4. **Modify Section 11.6.** Typo. First line of text. Should read "Any permit *issued* by the IWWC..."
Currently reads "issues".

I'm concerned that these proposed regulations are arbitrary in nature and center more on what if's as opposed to empirical knowledge that requires one to correct existing language and regulations. For that reason, I cannot support these modifications.

Best,

A handwritten signature in blue ink, appearing to read "F. B. Allyn III", with a stylized flourish at the end.

Fred B. Allyn III