

STATE OF CONNECTICUT
DEPARTMENT OF PUBLIC HEALTH



Manisha Juthani, MD
Commissioner

Ned Lamont
Governor
Susan Bysiewicz
Lt. Governor

Drinking Water Section

November 1, 2022

Juliet Hodge
Planning Director, Town of Ledyard
741 Colonel Ledyard Highway
Ledyard, CT 06339-1511

RE: Avery Brook Homes LLC's Proposal to Develop a 36-Lot Subdivision on the Parcels of Land Located at 94, 96, 98 and 100 Stoddards Wharf Road in Ledyard, Connecticut.

Dear Ms. Hodge,

The Department of Public Health Drinking Water Section's Source Water Assessment and Protection Unit has reviewed a proposal to develop a 36-lot subdivision at 94, 96, 98 and 100 Stoddards Wharf Road in Ledyard, Connecticut. Please refer to the attached report for our comments.

If you have any questions, you may contact Lisette Stone of this office at lisette.stone@ct.gov.

Sincerely,

Eric McPhee

Eric McPhee
Supervising Environmental Analyst
Drinking Water Section

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LAND USE DEPARTMENT

Cc: Wendy Brown-Arnold, Supervisor of Land Use Activities, Ledge Light Health District
Ron Gaudet, Director of Utilities, Groton Utilities
Peter Gardner, President, Dieter & Gardner Inc.
Harry B. Heller, Heller, Heller & McCoy Attorneys at Law



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MEMORANDUM

Subject: Review of Avery Brook Homes LLC, Project Proposal for a 36-Lot subdivision on the parcels of land located at 94, 96, 98 and 100 Stoddards Wharf Road in Ledyard, Connecticut, Pursuant to Connecticut General Statutes (CGS) CGS Section 25-32f

Date: November 1, 2022

Pursuant to Connecticut General Statutes (CGS) CGS Section 25-32f, the Department of Public Health Drinking Water Section has reviewed the proposal of one Avery Brook Homes, LLC, to develop a subdivision of 36 individual housing units, each with a dedicated private drinking water well and subsurface sewage disposal system (a.k.a. septic system), on a \pm 9.4 acre area of land located at the integrated parcel formerly 94, 96, 98 and 100 Stoddard's Wharf Road, in the town of Ledyard, Connecticut and offers the follow comments.

The location of proposed development is approximately 245' Southeast of the Billings Avery Brook Diversion, a public drinking water source, and entirely within the reservoir's associated public drinking watershed. This reservoir is currently utilized as a source for drinking water supply by Groton Utilities (PWSID CT0590011), a public water system that serves over 30,000 people.

In order to protect drinking water resources, the Department of Public Health provides the following comments during the design and approval phase of this proposed development:

- It is recommended that Avery Brook Homes LLC coordinate with Ledge Light Health District, the Town of Ledyard and Groton Utilities in a comprehensive review of the site's Water Study (July 6th 2022, GEI Consultants) to ensure hydrogeological data reflect that the quality and supply of public drinking water resources will not be adversely impacted by the development, use or maintenance of the proposed subdivision.
- Pursuant to the Regulations of Connecticut State Agencies (RCSA) Sec. 19-13-B32(c) Sanitation of Watersheds; *No sewage disposal system shall be located on any watershed, unless such a facility is so constructed that no portion of the contents can escape or be washed into the stream or reservoir.* It is recommended that the Town of Ledyard and Ledge Light Health review and consult if additional protections may be necessary to mitigate the potential for mobilization of contaminants from the construction and collective use of 36 individual subsurface sewage disposal systems within the drinking water watershed.
- It is recommended that consideration be given to the carrying capacity of the aquifer for the large number of wells to be constructed on this lot. Yield tests of all 36 wells are to be conducted for each well as part of the development requirements; it is recommended that consideration be given to monitoring adjacent wells during the testing process or conducting simultaneous yield tests to determine the ability of the aquifer to reliably sustain all of these sources. Results of any monitoring should be provided to the Department of Public Health and Ledge Light Health

District with any other evidence illustrating that the wells will be able to provide an adequate water supply to the residences.

- The Regulations of Connecticut State Agencies (RCSA) Section Sec. 19-13-B32(h) was promulgated to limit the impact of road salt on drinking water watersheds. Considerations for placement of the 36 residential wells and management of snow/ice mitigation on the property should reflect the concern that sodium and chloride are increasing in public water supplies, including Groton Utilities.
- A comprehensive stormwater management plan, consistent with the Town of Ledyard's Stormwater Management Plan, should be incorporated into the construction design and maintenance of the subdivision to ensure that runoff from impermeable surfaces will not compromise the quality of subdivision residential wells or public drinking water resources. Green Stormwater Infrastructure (GSI) and Low Impact Development (LID) methods are recommended for incorporation into the design, construction and maintenance of the subdivision to prevent any pollutants from being discharged and/or mobilized within drinking water resources.
- The Department of Public Health, Ledge Light Health District, Groton Utilities and the Town of Ledyard should be granted reasonable access at regular intervals to ensure that the proposed development is constructed, operated and maintained in a manner that is protective of the public drinking water resources.
- The Town of Ledyard should ensure that the proposed construction activities are consistent with the policies of GMP #5 of the Conservation and Development Policies Plan for Connecticut 2018-2023 (C and D Plan). This Plan serves as a guidance for all development in the state. Growth Management Principle #5 (Protect and Ensure the Integrity of the Environmental Assets Critical to Public Health and Safety) of the C and D Plan states:

"It is also important that municipal land use commissions fully consider the broader regional implications of their decision-making processes, whenever there are potential impacts to the integrity of environmental assets and working lands that are critical to the well-being of citizens beyond their local boundaries."

- Pursuant to Connecticut General Statute (CGS) 19a-37 (2), newly constructed private wells must be tested for water quality with results submitted by the conducting laboratory to Local and State Health Departments within 30 days of testing. While on-going testing of existing private wells may not be required at this time, it is important to take proactive and preventative measures to ensure that drinking water quality maintains the highest of standards for its consumers.

The below guidance is provided in support of the recommendations provided herein.

DPH

- Recommendations for Testing Private Wells and Semipublic wells

EPA

- Prevent Water Well Pollution
- Drinking Water From Household Wells

UCONN Center for Land Use Education and Research (CLEAR):

- Green Stormwater Infrastructure (GSI) and Low Impact Development (LID)
- The State of Low Impact Development in Connecticut
- CT Nonpoint Education for Municipal Officials (NEMO): Stormwater Basics

DEEP

- Connecticut Stormwater Quality Manual
- Stormwater Quality Worksheet