

July 28, 2026

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, and the Town Engineer 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. As requested above, a comprehensive list of all public improvements shall be submitted by the applicant.

Response: Public improvements include a sidewalk connection to the proposed development, driveway connections to Center Groton Road, a sewer force main, a water main connection, and electrical connection to the development.

2. New Comments received 7/20/26. Plans not approved for GU Water & Watershed – See attached comments from GU - Contract Operator for Ledyard WPCA Water system.

Response: Comments received. Responses to those comments are provided in Section 3.

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

Response: Acknowledged.

4. 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.” Applicant states: “these conditions will not exist.” Staff comment: GU shall confirm same. BL will add to add notes to plan regarding SPCC for construction equipment.

Response: Spill control notes from the O&M were added to the general notes sheet. Refer to sheet G0.01.

5. Comment addressed. 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.” Draft MOU Received. Condition of approval. Final Draft shall be submitted prior to issuance of a zoning permit to start work.

Response: Acknowledged.

6. 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.

7. Applicant submitted “Stormwater System Operations and Maintenance Plan on July 1, 2026. Condition of any favorable approval – All stormwater systems shall be operated and maintained in accordance with said Plan. Town Engineer shall review and comment.

Response: Acknowledged.

Existing Conditions Survey (EX-1):

1. 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. Applicant states: "Niles Road is abandoned roadway, resulting from the relocation of Connecticut Route 117 to the east. The status of Niles Hill 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 9. Niles Road no longer physically exists, is no longer passable, is completely revegetated with mature forest, and the Town of Ledyard no longer maintains it or shows it on its town road map." Staff comment: Not addressed. This statement does not comply with my above-referenced request (underlined). Title opinion pending per Attorney Bill Sweeney on 7/21/26.

Response: A title opinion was sent to the Land Use Director via email on 07/24/2026 by Bill Sweeney.

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 adjustment plan is included within this submission to transfer the portion of the property with the encroachment.

3. Applicant states "A Lot Line Revision Plan is include with this submission." Staff Comment: The lot line revision plan shall be reviewed and approved by the Land Use Director, Zoning Official and Ledge Light Health District as required. A B100A application to LLHD may be required. The plan will be re-referred to LLHD for comment.

Response: Acknowledged, please see the lot line revision plan included with this submission.

Demolition Plan (C0.00):

1. Preliminary comment “Boundary stone walls are to be protected and preserve. L.S. shall flag in field in some manner prior to the start of work” acknowledged by Applicant. Condition of any favorable approval, L.S. shall flag in field in some manner prior to the start of work.

Response: Acknowledged, demolition plan (C0.00) has been updated to note a Licensed Survey shall mark the stone walls before the start of construction. Additionally, a note has been added to the erosion control notes on sheet C4.100.

2. 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.

Site Plan (C1.00):

1. 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. Applicant advised each unit will have either a concrete pad patio or decks. Provide detail for concrete pad patios.

Response: A concrete patio detail has been added on sheet C1.01.

2. Preliminary comment “All work in the state right of way requires an encroachment permit from the State of CT DOT (Dept. of Transportation)” confirmed by Applicant. 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

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

1. 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. Condition of any favorable approval - 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. Applicant has acknowledged.

Response: Acknowledged

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

1. Preliminary comment addressed – “*Coordination is ongoing*” - Site Utilities Plan requires review and approval by Fire Marshal (bollards as needed, fire hydrants locations), Groton Utilities for water on behalf of WPCA and Weston & Sampson for sewer on behalf of WPCA. Building Official shall be consulted for any required building permits relative to any utilities. Condition of any favorable approval - Approval by all agencies noted required prior to the issuance of zoning permits to start work.

Response: Acknowledged, coordination is ongoing.

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

1. Comment addressed. Applicant has advised there are no slopes proposed greater than 3:1.

Response: Acknowledged, a note has been added to the grading plan to indicate that no slopes shall be steeper than 3:1.

2. Comments 4, 9, & 10 addressed. Condition of any favorable approval – Due to proposed steep slopes as part of this project, Applicant shall keep a log of all inspections including photos of the areas inspected that may be reviewed by the Zoning Official or Director of Land Use upon request.

Response: Acknowledged.

3. Not addressed. Sediment and Erosion Control Notes – Note #3 - Erosion and sediment control bond estimate shall be submitted for review & approval by the Town Engineer. Applicant states Erosion Control Bond will be provided for approval once available. Bond estimate shall be submitted for review & approval by the Town Engineer no later than Thursday, 7/23/26.

Response: Bond Estimate is included with this submission.

4. Previous Comments 12 & 13 addressed. Condition of approval – Due to proposed steep slopes as part of this project, applicant shall keep a log of all bi-weekly

inspections including photos of the areas inspected that may be reviewed by the Zoning Official or Director of Land Use upon request.

Response: Acknowledged.

5. 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.

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

1. Preliminary comment noted by Applicant. Condition of any favorable Approval. The developer shall submit a site completion landscaping bond to insure same.

Response: Acknowledged.

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

1. Preliminary comment noted by Applicant “Consideration will be given to matching lighting style in Ledyard Center.” Commission should strongly consider. Applicant states it is considering matching LCDD lighting at the front of the property. Condition of any favorable approval recommended.

Response: Acknowledged.

Ledyard Zoning Regulations Sections:

1. 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, stone crushing will take place in accordance with Section 7.10.

2. 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.”

Response: Acknowledged.

3. Preliminary comment partially addressed. Revise plan to show painted areas or center line to show site circulation. Applicant states plan will be revised to show site circulation as noted.

Response: Site plan was revised to show centerline striping.

4. Preliminary comment partially addressed. Accessible outside parking spaces shall also be shown for accessible units (v. just inside garage). Building Official will research.

Response: The accessible parking space for accessible units is within each garage.

5. 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.

6. 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.

Section 2 – Town Engineer Comments

Stormwater Management Report

1. Page 15; POST-DEVELOPMENT HYDROLOGIC CONCLUSIONS: The 100-Year Storm Post-Development value for DP-1 (3.09) and DP-3 (0.05) does not correspond to the calculated value given in the hydrographs (3.63 and 0.48, respectively). The total should also be changed accordingly.

Response: Stormwater report has been updated to match the hydrographs.

2. APPENDIX E; CONVEYANCE MODELING RESULTS, Engineering Profile, CB-408 TO OCS-4B (editorial)
 - a. In the title, “OCS-4B” should be “CB-411.”
 - b. In the diagram, “CB-403” should be “CB408.”
 - c. The diagram elevations should conform to the plans.

Response: The profile has been updated to reflect these changes.

Section 3 – Groton Utilities Comments

Water Utility General Comments

1. Existing water main at Center Groton Rd — 16” DI. GU noted relocation of water main tap to new, northern driveway, please note on the plan a minimum 10 ft. separation distance from force sewer.
 - a. Please note this separation is required the entire length of the force sewer main, routing north on Center Groton Rd and once it turns east on Colonel Ledyard Highway (Sheets: C3.10, C3.00 and C3.100). If vertical separations are utilized, please indicate this in notes on the plan
 - b. GU Water Spec Detail # 5 provides additional information.

Response:

- a. ***A typical dimension has been added for the routing of the force main on Center Groton Road and Colonel Ledyard Highway for the required separation.***
 - b. ***Detail #5 has been added to the plan set on sheet C3.101.***
2. Existing Static Pressure is approximately 63 PSI static at Center Groton Road. GU will perform the tap at the 16” DI water main on Center Groton Road with a tapping sleeve and valve. Please note this on the Plan. Contractor to coordinate with GU Project Management on tapping requirements, scheduling and procedures. Note this on Utility Plan Sheet. ~~A meter pit and curb box will be required for each individual water service, per Ledyard WPCA Rules and Regulations.~~ GU has requested written documentation (from Ledyard WPCA) of a verbal conversation between the developer and the WPCA, in which Ledyard WPCA waived the Meter Pit Policy requirements.
 - a. Our current understanding is that for each building, a utility cabinet/room, with maintenance access, will be installed; within the cabinet, a manifold with four (4) meters will be installed and associated piping to each of the four units.
 - b. Please note that the meters will require associated wiring be routed through a small diameter pipe and to the face of the building. GU Meter Shop can provide additional information.
 - c. The WPCA Water & Server Commitment Letter, provided to the developer, outlines conditions for the contract operator to perform routine leak detection monitoring and owner requirements to repair any leaks within 60 days of a notification letter.

Response:

A note stating the contractor to coordinate with GU regarding the tap and GU will perform the tap has been added to the utility plan (C3.00).

- a. ***There will not be a utility cabinet or room. Each unit will have its own individual water meter located inside the unit, along with a dedicated curb stop. Ledyard WPCA has agreed to this.***
- b. ***Acknowledged.***
- c. ***Acknowledged.***

5. Additionally, please note on Plan:

- a. Required 5' horizontal or 18" vertical clearance separation of water and stone water utilities.
- b. Note water 6' min. horizontal separation from UG telecommunications and electric.

Response:

- a. ***A note has been added to the utility plan (C3.00).***
- b. ***A note has been added to the utility plan (C3.00).***

6. Flow Demand Letter to be provided to GU Water Meter Department. GU Meter Department will size meters based on flow demand provided. Meters are provided through GU Meter Shop.

Response: Acknowledged

7. Contact GU Water Meter Department to review requirements for the layout, quantities, and sizing of meters and back flow devices at domestic and fire protection:
- a. Groton Utilities Meter Department: 860-446-4077.
 - b. Contractor to coordinate with GU Water Meter Department for temporary water meter/backflow device rental and water usage requirements during construction.

Response:

Applicant will coordinate with GU Water Meter Department for the review of the layout, quantities, and sizing of the meters and back flow devices.

- a. ***Noted.***
- b. ***Acknowledged.***

8. Hydrants:

- a. Hydrant quantities and locations are to be determined/approved by Fire Marshal. Currently, four (4) are shown.
- b. Please coordinate with Groton Utilities about ownership and hydrant agreements.

Response:

- c. ***Applicant will coordinate with the Fire Marshal for review and approval.***
- d. ***Acknowledged.***

9. Unmetered Fire Sprinkler Agreement will be required for annual billing.

Response: No sprinkler systems are proposed.

10. Contractor to provide As-built records at project completion.

Response: Acknowledged.

11. Please remove Generic Spec details on page :C3.100 and replace with Groton Utilities' Water Specification Sheets 1-20: Add GU Technical Drawings

- #1 – Typical Gate Box
- #2 – Gate Valve Connection Detail
- #3 – Tapping Sleeve & Valve
- #4 – Thrust Block Details
- #5 – Typical Sewer & Drain Crossing
- #6 – Hydrant Assembly Detail
- #7 – Brass Wedge Detail
- #13 – Backflow Preventer Install
- #17 – Typical Trench Detail
- #19 – Typical Tracer Wire Detail
- #20 – Water Service Trench Detail

Response: The requested details have been removed from the set and GU technical drawings have been added to sheets C3.100, C3.101, & C3.102.

12. Please contact Groton Utilities Project Manager, Kate Blacker, assigned to this project.

Response: Applicant will coordinate with Kate Blacker.

13. Groton Utilities is the Contracted Water Operator (This does not include the Sewer). Ledyard WPCA's consultants, Weston and Sampson, review sewer and force server infrastructure on this project.

Response: Acknowledged.

Watershed Comments

1. We request addition of a note on Stormwater Operations and Maintenance Plan to notify Groton Utilities if a spill ever occurs.

Response: Acknowledged.

2. Roof & Yard Discharges to Swale and CB-208 – We continue to remain concerned with accumulation of flow designed to enter the catch basin at CB-208, The explanation given is that “....any bypass of flow will be captured by catch basins down slope and will be routed to the treatment areas.” The flow into the catch basin (i.e., CB-208), as well as the bypass flow do not appear to be qualified, and the reference to appendix E does not appear to provide the “gutter spread calculations” noted. Any ponding, storage or detention of flow in the areas of the catch basin would be minimal, based on proposed contours, and bypass flow would appear to be directed to roadway and parking areas, as well as toward PDA-42, rather than the intended PDA-21. We would ask for some further clarification on this issue.

Response: A second double catch basin has been added upstream of CB-208 to ensure full capture of all flow within the swale. Additionally, gutter spread calculations are included in Appendix E. They can be found on the catch basin table in the third-to-last column from the right labeled “Spread/Top Width (ft).” CB-208 has a ponding width of 10.7’. Based on the spot grades and contours, there will be enough room for 10.7’ of ponding around the structure.

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