

Commissioner Manisha Juthani, MD
Department of Public Health



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ENVIRONMENTAL HEALTH AND DRINKING WATER BRANCH

JUL 23 2026

Land Use Department

VIA ELECTRONIC MAIL

June 18, 2026

Liz Burdick
Director of Land Use and Planning
Town of Ledyard
741 Colonel Ledyard Highway
Ledyard, CT 06339

RE: 1947 Center Groton Road Proposed Multi-Family Residential Development - Connecticut Department of Public Health Comments pursuant to CGS §§ 8-3i and 25-32f

Dear Ms. Burdick,

Pursuant to Connecticut General Statutes (CGS) § 8-3i, BL Companies provided notice to the Connecticut Department of Public Health (DPH) on behalf of EG Home LLC (Applicant) for the multi-family residential development (Project) proposed at 1947 Center Groton Road in Ledyard, (Location).

In accordance with CGS § 25-32f, DPH reviewed the materials submitted for local land use consideration, including the site, drainage, and utility plans dated April 1, 2026, and the project record materials identified on the Town's May 5, 2026 Inland Wetlands & Watercourses Commission agenda for IWWC#26-7SITE, including the BL Companies Wetland & Watercourse Investigation, Stormwater Design Summary, Stormwater Management Report received April 22, 2026, revised plan sets, GPU watershed/utility referrals and comments, the Water Main Record Plan, the applicant's response to GPU comments, and Public Works Director comments (collectively "Records").

According to the Records, the Project consists of a 72-unit residential development on approximately 10.6 acres, including 17 residential buildings, 169 parking spaces, internal roadways and sidewalks, retaining walls, stormwater management features, and sanitary utility infrastructure. The Project scope of work will disturb approximately 1.38 acres of upland review area and introduce approximately 0.05 acres of permanent impervious surface to the upland review area. The stormwater design includes detention ponds, rain gardens, level spreaders, hooded catch basins, and a hydrodynamic separator. The utility plans also depict a duplex sanitary sewer pump station, an emergency generator, and sanitary force main infrastructure.

The Project is located entirely within the public drinking water watershed (Watershed) for the Morgan Pond Reservoir (Reservoir), an active source of supply for the Groton Public Utilities public water system (GPU). Any manipulation of land within the Watershed has the potential to impact the quality and/or quantity of GPU's public water supply. It is therefore critical that risks to the Watershed be minimized. DPH recommends that any approval issued by the Town of Ledyard (Town) include the following conditions to ensure that GPU's public drinking water resource remains adequately protected during both construction and long-term established use of the Location:

- Erosion and sedimentation controls (ESC) measures should be consistent with the [Connecticut Guidelines for Soil Erosion & Sediment Control](https://portal.ct.gov/-/media/deep/water/water_quality_management/guidance/sescg_cleanfinal.pdf?rev=7a4cbf1406e841799148b1f8d4033f80&hash=679015A2EC8F068083F9F15B8A13AF90)¹, installed prior to disturbance, maintained throughout construction, and kept in place until disturbed areas are fully stabilized. All clearing, grading, excavation, utility installation, road construction, retaining wall and drainage work, particularly in the upland review area, should be managed to minimize the extent and duration of exposed soils and prevent sediment-laden runoff from reaching adjacent wetlands, drainage features, and stormwater structures. ESC should be inspected regularly and after significant precipitation events, with immediate corrective action where deficiencies are observed.
- Any dewatering associated with excavation, utilities, or drainage installations should be controlled, filtered as needed, and discharged in a manner that prevents erosion and avoids direct discharge to sensitive drainage pathways. Stable vegetated cover should be installed over disturbed areas as soon as practicable. All grading and drainage features should preserve or enhance the Location's pollutant attenuation and infiltration capacity and should avoid creating concentrated, erosive discharges toward the Reservoir watershed drainage network.
- The Stormwater Management system should be consistent with the [Connecticut Stormwater Quality Manual](https://portal.ct.gov/-/media/deep/water/water_quality_management/guidance/swm_mar_2024.pdf?rev=1dafa8e03ca4ec98f5ec011d803f4dc&hash=A49802ED8F721C491C85776C3E77CF51)² and with the most recent Stormwater Report and plans accepted into the municipal record, including revisions made in response to GPU, the Ledyard Water Pollution Control Authority (WPCA) and the Town's comments. The proposed stormwater controls and conveyance structures should be designed, installed, maintained, and protected during construction to prevent clogging and loss of function.
- DPH notes GPU's concern that the majority of stormwater roof runoff appears to be directed to one swale on the western side of the Location with limited catch basins and the potential to discharge toward the Reservoir, and that the currently proposed treatment may be insufficient for the Project size. Final stormwater design should demonstrate that runoff from roofs, roads, parking areas, and all other developed portions of the site will be adequately captured, treated, attenuated, and discharged in a manner that avoids untreated or under-treated flow toward downgradient swales, wetlands, or other drainage features tributary to the Reservoir.
- DPH supports GPU's request for additional protective stormwater drainage and treatment measures as necessary, including consideration of an underground treatment chamber, as necessary, to address remaining drainage and treatment concerns identified during municipal and utility review. DPH recommends that these concerns be resolved prior to Town approval and supports GPU's recommendation that a Memorandum of Understanding (MOU) be executed between GPU and the future owner to ensure ongoing compliance through maintenance of stormwater facilities consistent with a Stormwater Maintenance Plan. A copy of the Connecticut Energy and Environmental Department (DEEP) Construction Stormwater General Permit and associated compliance documentation should be obtained and provided to the Town and GPU prior to commencement of land disturbance.

¹ Connecticut Guidelines for Soil Erosion & Sediment Control, publication date September 30, 2023, https://portal.ct.gov/-/media/deep/water/water_quality_management/guidance/sescg_cleanfinal.pdf?rev=7a4cbf1406e841799148b1f8d4033f80&hash=679015A2EC8F068083F9F15B8A13AF90.

² Connecticut Stormwater Quality Manual, publication date September 30, 2023, https://portal.ct.gov/-/media/deep/water/water_quality_management/guidance/swm_mar_2024.pdf?rev=1dafa8e03ca4ec98f5ec011d803f4dc&hash=A49802ED8F721C491C85776C3E77CF51

- All water and sewer main installations should be accurately reflected in site plans. Piping must be installed in accordance with state, local and utility requirements. As a general recommendation, water and sewer mains should, whenever possible, be at least 10 feet apart, and crossings should maintain at least 18 inches of vertical separation. It should be strictly prohibited that sanitary overflows, bypasses, or discharges reach wetlands, stormwater systems, or adjacent drainage features.
- The Applicant should develop an operations and maintenance plan (O&M) that includes routine inspection schedules during construction, after significant weather events, and for the life of the Project to verify the performance of ESCs, stormwater and stabilization measures. The O&M plan should define sediment and debris removal triggers, identify responsible parties, and include timely corrective actions.
- Contaminant loading of fertilizers, herbicides, pesticides, pet waste, petroleum products, and winter maintenance materials associated with high-density residential use should be minimized. Landscaping should prioritize Low Impact Development (LID)³ measures to the maximum extent practicable. Winter maintenance practices should minimize chloride loading through calibrated application and proper storage and handling of deicing materials.
- The Applicant should prepare and implement a Spill Prevention and Response Plan addressing equipment maintenance, fueling, chemical handling, and construction activities. Spill kits should be maintained on site and staff should be trained in spill prevention and response. Fueling, equipment maintenance and chemical storage should occur only outside of sensitive drainage features in designated, controlled, impervious areas with secondary containment and measures to prevent mobilization of contaminants to wetlands or stormwater systems.

The Project should be constructed in accordance all applicable Town, WPCA and GPU conditions reflected in the municipal record. Prior to construction, the Applicant should provide these entities with the final site plans, including final stormwater, ERC, O&M, Spill Prevention/Response plans, all enforceable protective measures, and a 24-hour emergency contact. During construction, these entities should be afforded reasonable access at key construction milestones and periodically thereafter to observe site conditions relevant to protection of the Watershed.

If you have any questions, please contact Lisette Stone at Lisette.Stone@ct.gov.

Sincerely,



Lisa Michelle Morrissey, MPH
Deputy Commissioner

Cc: Douglas Lafontaine, Manager of Engineering, Water & Wastewater Departments, Groton Utilities
Jennifer Muggeo, Director of Health, Ledge Light Health District
John Schmitz, Senior Engineer II, BL Companies

³ Center For Land Use Education And Research - Watershed Protection Strategies/Low Impact Development
<https://nemo.uconn.edu/watershed-protection-strategies/low-impact-development/>