



**TOWN OF LEDYARD**

# Memorandum:

**To:** Juliet Hodge, Director of Land Use & Planning  
**From:** Steve Masalin, Public Works Director/Town Engineer *SM*  
**Date:** March 31, 2023  
**Re:** 1761 Route 12 (PZ #23-4SUP)

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03 2023  
LAND USE DEPARTMENT

I have reviewed the plans and Stormwater Management Report for the subject application.

I find that they meet the requirements of the Ordinance 300-017 (Management of Stormwater Runoff). I qualify this with the following:

- This ordinance is outdated (3/1/95) and is presently undergoing revision as part of a comprehensive initiative regarding infrastructure specifications and regulations.
- Though it allows increased peak flows for discharge directly to the Thames River (as is the present case), this goes against several other more recent regulations governing stormwater, the requirements of which will be adapted to our local regulations.
- This includes Municipal Storm Separate Storm Sewer (MS4) program requirements to which the Town is subject and for which the Town is undergoing various compliance actions. One example is the disconnecting of impervious areas (i.e., elimination of direct impacts of impervious area runoff through retention, etc.).
- Additionally, this project is within a designated Connecticut Coastal Management Area. There are several stipulations in the Connecticut Coastal Management Manual that similarly seek practices to mitigate stormwater impacts, e.g., retention, as appropriate.

The proposal characterizes its measures as the “attenuation and treatment of all stormwater events leaving the Site...” (para. 5). Though the proposed measures are robust toward this end, the applicant should consider implementation of measures and best management practices that go beyond the limits of the ordinance and of the requirements of the 2004 Connecticut Stormwater Quality Manual toward those recommended by the MS4 and CCM provisions, where feasible.

Also, the CAM Manual mentions the regulatory role of DEEP concerning stormwater discharges in regulated areas. The applicant should ensure compliance with DEEP requirements.

By way of specific question is the suitability/adequacy of the existing stormwater system to handle the additional flows conveyed to it from the new system. Though there is a natural/convenient connection point for this extension, there is limited information given as to the capacity within the existing system to handle the added flow, though characterized as a “small amount” (para. 3.3).