

TO: Gary Upton, Chairman, and Members of the East Lyme Wetlands Agency

FROM: Margaret Miner, Environmental Consultant,

RE: Public Hearing on Application of the Town of East Lyme Inland Wetland Agency for a text amendment to [the Regulations to enlarge] the distance of the boundary for a regulated activity from 100' from an inland wetlands and/or watercourse to 500'.

DATE: July `13, 2020

Thank you for the opportunity to comment in support of the proposed amendment to your IWA Regulations to expand the boundary of your regulated area from 100' to 500'. .

I am not a lawyer or soil scientist, but, as the former executive director of Rivers Alliance of Connecticut and a present member of the Water Planning Council Advisory Group, I've been involved in many wetlands-protection deliberations. I continue to work as a consultant to help with water policy and water protection in the field.

I know that you are an extremely hardworking commission, and thank you for your good stewardship. Policy makers are ever more aware these days that our high-quality water may be in shorter supply than we realize. I believe that every town should be considering the kind of expansion of the review area that are undertaking.

Even though wetlands-protection law in Connecticut addresses *actions* that may adversely affect wetlands, applicants and others tend to expect that anything being done outside a "regulated" or "review" area is okay. At the same time, the increasing efforts to develop difficult sites lead to difficult cases for wetlands commissioners. This is particularly common where there are steep, rocky, wooded slopes or shoreline cliffs. Science tells us that the hydrology and ecology of a site can be significantly altered by activities such as excavating, blasting, tree clearing, grading and so forth, even when done outside a regulated/review area. Recently, Rivers Alliance has asked Dr. Gary Robbins at UConn to help us with his expertise on the likely effects of rock blasting (for driveway construction) on the quality and quantity of water available for potable uses.

Blasting is the kind of activity that can have major adverse effects at a considerable distance from the action. This kind of problem is recognized in your all-important definition of "significant impact." : "*Significant impact*" means any *activity*, including, but not limited to, the following *activities* which may have a major effect: [emphasis added]

Thank you again for your good work.

Margaret Miner,

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