

Town of

P.O. Drawer 519

**Department of Planning &
Inland Wetlands Agency**

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MEMORANDUM

TO: William Mulholland, Zoning Official, East Lyme Zoning Commission, and East Lyme Inland Wetlands Agency

FROM: Gary A. Goeschel II, Director of Planning/ Inland Wetlands Agent 

DATE: September 29, 2020

RE: **Multi-Family, Affordable Housing Application – North Bride Brook Multi-Family Development:** Application of Pazz & Construction, LLC and 8 sheet plan set entitled North Bride Brook Multi-Family Development, prepared for Pazz & Construction, LLC, dated 9/25/19 revised through 7/10/20, sheets 1 through 8.

Upon review of the above referenced application and the proposed plans entitled “North Bride Brook Multi-Family Development, prepared for Pazz & Construction, LLC, Sheets 1 of 8, dated 9/25/2019 and revised through 7/10/2020,” by Brandon J. Hanfield, P.E. of Yantic River Consultants, LLC of 191 Norwich Avenue, Lebanon, CT, I offer the following:

1. There is no direct impact on the wetlands or the watercourse as the all construction activities will be conducted outside the 100-foot upland review area from any inland wetlands and/or watercourses. Therefore, there are no irreversible and irretrievable loss of wetlands or watercourse which would be caused by the proposed regulated activity.
2. The project has been designed to protect the wetlands and watercourses as the buildings structures, driveways, and drainage structures are designed to be situated outside of the wetlands and the 100-foot upland review area as well as are all the public utilities (sewer, water, electric, etc..).
3. Mitigation measures to minimize and mitigate potential impacts from the creation of new impervious surfaces on the site and to protect the wetlands and watercourses, and the groundwater such as stormwater management structures (catch basins) and the retention pond, will pre-treat and control runoff, and promote groundwater recharge.
4. Potential impacts during construction are proposed to be mitigated by the implementation of temporary erosion and sedimentation controls as well as stormwater controls throughout all phases of construction.

5. The upland review process does not forbid activity based solely on proximity to wetlands. Rather, the upland review process merely provides a basis for determining whether activities will have an adverse impact on the adjacent wetland or watercourse, and if necessary, regulating them. As Demonstrated by North Bride Brook Multi-Family Development, the Stormwater Management Report prepared in accordance with the 2004 Connecticut Stormwater Quality Manual, verifies that the proposed detention pond attenuates peak flow rates and volumes as compared to the pre-development conditions, resulting in a net zero (0) increase in run off from the development for the 2 through 100-year storm events.
6. The proposed detention pond will enhance stormwater runoff quality and recharge the groundwater as stormwater from the closed drainage system will enter a sediment forebay which, is separated from the detention basin by a "Detention Filter Berm" before passing through the semi-pervious filter berm into the detention basin itself.
7. The E&S Narrative and Construction Details provide construction notes and a long-term maintenance plan for the stormwater detention basin. Moreover, the Erosion and Sediment Control Plan was prepared according to the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control (CT DEEP), and includes a narrative, construction sequence and vegetative turf establishment procedures.
8. After having reviewed a previous report prepared by James Sipperly, Soil Scientist dated October 3, 2019, states: "The proposed development in the upland review area will not be disturbing any wetlands and/or watercourses on the site. For that reason, the inland wetlands will continue to perform their functions as they currently do." As such, the previously proposed activity avoided any direct impacts to the wetlands or watercourses and the design had been prepared to minimize the potential for secondary and indirect impacts through implementation of the Erosion and Sedimentation Control Plan. The proposed plans relocates all activity outside of the 100-foot Upland Review Area while continuing to follow both the Connecticut DEEP's 2002 Erosion & Sedimentation Control Guidelines and the 2004 Connecticut Stormwater Manual.
9. While the proposed construction does not propose an intrusion into the 100-foot upland review area, introducing a new and more intensive use than the present condition (forested land) and risks to the wetlands, there is no substantial evidence in the record to support a likely adverse impact on the wetlands and watercourse from the proposed construction.
10. In regards to the projects location, the underlying Zoning district is RU-80 and RU-40 Rural Residential Districts. The property is located approximately 1-mile from the I-95, Exit 72, Rocky Neck Connector and with only 15 single family dwellings to the north, the Gates State Correctional Facility to the east and directly abuts to the south approximately 35-acres of vacant land owned by the Connecticut State Department of Energy and Environmental Protection and is located within an existing Affordable Housing District associated with the 108-unit Sea Spray Condominium Complex. In addition, there are approximately 60-singlefamily dwellings located to the south of the site within the R-10 – Residential and the CA-Commercial districts. Currently, public transportation is not available in the area nor are there any public sidewalks along North Bridebrook Road.

As such, I recommend the following:

1. The Erosion and Sedimentation Control Plan and recommended Construction Sequence be followed;
2. Pursuant to the Erosion and Sedimentation Control Plan and construction sequence, notify the Zoning Official at least 2 days prior to construction to inspect erosion controls;
3. Silt fence and other erosion controls including temporary sediment traps and diversion swales to be installed be inspected by the Town Engineer prior to any site construction, land clearing or other associated construction activities;
4. In areas proposed to be loamed and seeded, a low maintenance lawn such as fescue, which requires minimal application of fertilizers and pesticides, shall be planted;
5. Forested cover within the upland areas should be maintained to the extent practicable. The propose Limits of Disturbance (LOD) should be strictly adhered to though out all phases of lot build out and construction.
6. An Erosion and Sedimentation Control Bond (aka financial guarantee) in an amount satisfactory to the Town Engineer, Zoning Official, and East Lyme Zoning Commission and in a form acceptable to the Town of East Lyme be posted with the Town of East Lyme Zoning Commission.
7. A copy of each weekly inspection report for the Stormwater Management Basin should be furnished to the East Lyme Zoning Official within 7-days of conducting said inspections.