

Date: July 1, 2025

To: Kristen Clarke, P.E.

Subject Property: Map 39, Lot 10 -2, 237 Upper Pattagansett Rd., Lots 32, 32-1, 32-2, 32-3, 32-4, 32-5

Plan Designed by: Timothy May, P.E. Plan Date: **5/23/25** Last Revision Date: **N/a** Date Paid: 6/13/25

The plan and associated information submitted to our office on **6/13/25**. The proposed lots range from 0.92 to 1.79 acres and are to be served by **private water** and **private septic systems**, in the Town of **East Lyme**.

1. Lot 32 was created previously ("**Nottingham Hills Subdivision Lot Line Revision of Existing lot 32 & 5 Lot Re-Subdivision of Lot 32. A conservation Design Development (CDD)**", January 17, 2025)
2. Lot 32 is proposed to be subdivided to create 6 building lots, identified on the submitted plan dated May 23, 2025 and labeled as Lots 32, 32-1, 32-2, 32-3, 32-4, & 32-5.
3. All proposed new parcels are unbuilt vacant land with no existing subsurface sewage disposal systems. The proposed activity consists of creating 5 building lots; the adjacent lots appear to be developed lots, undeveloped lots and open space.

The Ledge Light Health District (LLHD) does not issue approvals for Subdivision or Commission reviews, but our recommendation for suitability of the previously stated plan/lots to accommodate the LLHD Subdivision Submission Requirements and Connecticut Public Health Code Section 19-13-B103e are as follows:

- ☒ **Lot 32 is recommended suitable if and when the following plan issues are addressed:**
1. There is reference to "Lot 1 perc" but the perc test data is missing. Please add.
 2. There is only 1 test hole in the primary and no test holes in the reserve. LLHD policy requires two test holes in the primary and one in the reserve.
 3. The proposed primary and proposed reserve do not meet the required center to center distance for the product proposed.
 4. There is no mention of foundation drains.
- ☒ **Lot 32-1 is recommended suitable if and when the following plan issues are addressed:**
1. There is reference to "TH1 Perc" and "TH2 Perc", but the perc test data is missing. Please add.
 2. There is only 1 test hole in the primary and no test holes in the reserve. LLHD policy requires two test holes in the primary and one in the reserve.
 3. The proposed primary and proposed reserve do not meet the required center to center distance for the product proposed.
 4. Designer should consider additional testing upgradient or downgradient.
 5. Test hole 612 is missing from the plan but appears on the 7 sheet plan titled, "Nottingham Hills Subdivision Lot Line Revision of Existing Lot 32 & 5 Lot Re-Subdivision of Lot 32". Please add to this plan.
 6. There is no mention of foundation drains.
- ☒ **Lot 32-2 is recommended suitable if and when the following plan issues are addressed:**
1. There is only 1 test hole in the primary and no test holes in the reserve. LLHD policy requires two test holes in the primary and one in the reserve as well as a perc test in the primary and reserve.
 2. The math for MLSS needs to be shown, i.e. the HF, the FF, and the PF.

3. The tank is located 15' from the house. Will the house have foundation drains?
4. The proposed primary is less than 10' from the property line.
5. The proposed reserve is located 2' from the property line.
6. The proposed primary and reserve are located 2' from one another.



Lot 32-4 is recommended suitable if and when the following plan issues are addressed:

1. There are no test holes in the primary nor reserve. LLHD policy requires two test holes in the primary and one in the reserve as well as a perc test in the primary and reserve.
2. The math for MLSS needs to be shown, i.e. the HF, the FF, and the PF.
3. The tank is located 22' from the house. Will the house have foundation drains?
4. Test holes 605, 606, & 607 data are missing from the plan but appears on the 7 sheet plan titled, "Nottingham Hills Subdivision Lot Line Revision of Existing Lot 32 & 5 Lot Re-Subdivision of Lot 32". Please add to this plan.
5. Under leaching design notes "C" & "D", GST6236 is proposed, but the math is incorrect.
6. Test hole 606 was read as unsuitable by Wendy Brown-Arnold in December of 2023.
7. The perc test data for Perc 605, 606, and 607 is missing. Please add.



Lot 32-3 is not recommended suitable in its current condition and the following issues are to be addressed:

1. The tank is located 11' from the house and within the well radius. Will the house have foundation drains?
2. There are two test holes labeled "608". Please correct.
3. What is test hole "6108"?
4. Test hole 612 is missing from the plan but appears on the 7 sheet plan titled, "Nottingham Hills Subdivision Lot Line Revision of Existing Lot 32 & 5 Lot Re-Subdivision of Lot 32". Please add to this plan.
5. There is only 1 test hole in the primary and no test holes in the reserve. LLHD policy requires two test holes in the primary and one in the reserve as well as a perc test in the primary and reserve.
6. Test hole 606 is unsuitable and within 10' of the proposed leaching and should therefore be taken into account with the design.
7. Note "E" under leaching design states MLSS is not required, however, there are shallow mottles in test hole 609.



Lot 32-5 is not recommended suitable in its current condition and the following issues are to be addressed:

1. The tank is located 17' from the house and within the well radius. Will the house have foundation drains?
2. Where is the perc test data for Percs 601-604? Please add.
3. There are no test holes in the primary nor reserve. LLHD policy requires two test holes in the primary and one in the reserve as well as a perc test in the primary and reserve.
4. The proposed primary and reserve are located too close to one another.
5. Test hole 602 location and data are missing from the plan but appear on the 7 sheet plan titled, "Nottingham Hills Subdivision Lot Line Revision of Existing Lot 32 & 5 Lot Re-Subdivision of Lot 32". Please add to this plan.

"Additional Plan Issues"

1. It would be helpful if all lots and their respective test hole data and perc data were on the same page. Some test hole data only exists on the plan labeled, "Nottingham Hills Subdivision Lot Line Revision of Existing Lot 32 & 5 Lot Re-Subdivision of Lot 32".

2. Any and all test hole data and their locations conducted over the various years should be shown on the site plan. No data should be omitted.
3. Pages 2 and 3 make reference to a plan, "...revised June 21, 2022" without a name while discussing the basis of the leaching design. Please provide a copy of this referenced plan.
4. There is confusion over the test holes and their labels conducted by Ryan McCammon and Danielle Holmes. On 1/28/14, Ryan McCammon read test holes 1 through 4, and Danielle Holmes read test holes 1-5 on 12/2/24. There is no distinction between these test holes for lots 32 and 32-1. Please label differently/distinguish.
5. There is confusion over test holes and their labels conducted by Wendy Brown-Arnold and Danielle Holmes. On 12/13/23, Wendy Brown-Arnold read holes 601-608. On 1/7/25, Danielle Holmes provided test hole data for holes 601, 603-606, 609-613. If these are the same test holes and locations, please add all the data to the plan and use the most restrictive reading for the design. Please distinguish.
6. On pages 2 & 3, in the "Sanitary Design Criteria" boxes, please remove "Comment C", which references "MLSS not required" as MLSS is required for lots 32-2 & 32-4.
7. There is test hole data for 500, 501 and 502 shown, however, there are no identified locations for these test holes. Please add to the plan.
8. Please copy test holes conducted by Wendy Brown-Arnold labeled 601-608 more clearly as they are hard to read.
9. There are no comments about the proposed reserve systems. Please provide a product description.
10. On page 3, the legend is overlapping the data on Lot 32-5. Please relocate.
11. There are no mention of foundation drains for any proposed building.
12. There is no mention of utilities and whether they will be overhead or underground.

*Please note that soils testing indicated on this plan are representative of actual soils conditions and additional deep test pits and percolation tests may be required by the Ledge Light Health District if the building or system location is altered and/or the suitable septic area is limited. Applicant should be aware that subdivision approval IS NOT sufficient for individual lot approval. Each lot must be reviewed by the Ledge Light Health District at the time of building permit application in order to obtain lot approval and issue a septic/well permit.

Please call me at 860-910-0388 with any questions regarding this matter.

Sincerely,



Katie Baldwin, MPH, REHS/RS
Supervisor, Environmental Health

cc: Danielle Holmes
Town of East Lyme Building and Zoning Department

