



PLANNING & DEVELOPMENT

Date: December 19, 2023

To: Ellen Bartlett, PE., CLA Engineers, Inc.
Joao Ferreira - East Lyme Tree Service

From: Maureen FitzGerald, Environmental Planner

Re: Inland Wetland Application #23-12: 1122 & 1124 Hartford Turnpike
Proposed Construction of a Tree/Lumber Facility

Application Review Comments:

The following are preliminary review comments regarding inland wetland permit application #C-23-12: 1122 & 1124 Hartford Turnpike, which was received by the Conservation Commission on December 7, 2023.

- 1) The site lies within the Niantic River Watershed basin. The tributary along the west and south sides is perennial, and discharges to Oil Mill Brook, a Class A trout stream. The Niantic River Watershed Protection plan identifies this location as a conservation priority area due to the riparian wetlands and perennial stream resources. The isolated wetland to the east side of the site is a known vernal pool breeding area. Protection of wooded buffer areas adjacent to the wetland resources is a recommended protective action to prevent future water quality degradation.

The property was cited for unauthorized clearing and grading of @ 0.5 acre of forested land in the upland review area last year. The proposed extent of clearing and wood chip stockpile/disposal area extends to the limits of that unauthorized clearing. The Conservation Commission may determine that wider forested buffer areas are necessary to protect the receiving wetlands and watercourses/vernal pool from adverse impacts of the proposed commercial use.

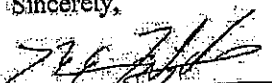
- 2) The applicant has already expanded the wood chip surface area to the "proposed" limits in the south end of the site with an estimated depth of 4 inches. The owner was requested to stop conducting unauthorized activities in the upland review area until required permits for the facility and its components are issued. This activity is being conducted without required inland wetland authorization.
- 3) Remove the wood chip berm shown on sheets 1, 2 & 3 and the note to maintain said berm. This was an erosion control measure for the prior unauthorized clearing extent and is within the proposed 50 ft. buffer area. The proposed clearing and grading activity will require independent temporary and permanent sediment control measures.
- 4) The grading plan indicates removal of 2-4 feet of earth material from approximately 300 feet of ridgeline. No fill is proposed at the south end of the site. Will this material be removed from the property?

- 5) Are the existing grade lines indicative of current site conditions or has the area been previously graded?
- 6) Low impact development measures should be implemented on this site plan to avoid concentration of post-development run-off. Use of rain gardens for the house roof run-off, vegetated swales along the edge of paved surfaces in the front of the structures, and relocation of the water quality basin closer to the edge of the commercial parking area is requested.
- 7) Reduction of the proposed impervious surface area is requested. A 24 ft. wide access lane is the minimum required in a commercial parking area; a 45 ft. wide access lane is proposed on the plan.
- 8) The underlying soils are highly permeable, Hinckley loamy sand over sand and gravel deposits. Sheet-flow run-off from the paved area, in particular the water quality volume, will likely not reach the stormwater treatment basin in the basin's currently proposed location. The run-off will likely soak into the receiving soils and discharge along existing hydrologic gradients towards the brook. Can the basin be reconfigured, the size reduced and relocated to the edge of the proposed impervious parking area to collect and treat the water quality volume of stormwater run-off from the asphalt? Otherwise curbing and catch basins may be necessary to collect run-off from the parking surface and direct it to the water quality basin.
- 9) What were the considerations for over-sizing the stormwater quality basin. Is on-site detention needed in this upper watershed, particularly considering the permeability of the sub-soil?
- 10) Permanent demarcation of the limits of parking and the wood storage & wood chip stockpile/disposal area should be included on the proposed site plan.
- 11) Spill control and hydrocarbon containment measures are requested for the commercial machinery parking lot. The plan should clarify if outdoor maintenance and fueling of equipment is proposed to be conducted at this facility. Machinery maintenance has been observed on this site during previous site inspection reviews.
- 12) What is the maximum proposed depth of the wood chip disposal area within the upland review area of the vernal pool and the riparian wetland corridor? This is disposal and fill, not soil nourishment or stockpiling of processed wood for future use. What are potential impacts to soil acidity, groundwater and surface water quality? Is disposal in the floodway considered fill?
- 13) Preliminary comments from the Planner question whether the processing and storage of wood chips is allowed under the zoning regulations. Please provide the revised statement of use and explanation of site activities as part of the inland wetland application.

I would like to meet and discuss the above comments and the unauthorized activity being conducted at this site prior to presenting this proposal to the Conservation Commission.

Please contact me at mfitzgerald@waterfordct.org or call 860 444-5813.

Sincerely,


Maureen FitzGerald
Environmental Planner
Town of Waterford, CT