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Connecticut Water Company

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January 27, 2016

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Mr. David Radka, Chairman
Inland Wetlands Commission
Town Hall
54 East Main Street
Clinton, CT 06413

Re: Public Hearing: The Village at Mill Pond, 11 Killingworth Turnpike

Dear Mr. Radka:

The Connecticut Water Company (CWC) has received notification for the above proposed project. The subject property is located adjacent to our Clinton Well and partially located within the aquifer protection area of this well, as delineated by our Department of Energy and Environmental Protection Level A approved aquifer protection map. We are therefore concerned with any activities located within the aquifer protection area that could impact the water quality and quantity of this important public water supply source.

In general, the uses proposed for this site (retail, restaurant, hotel) are acceptable land use activities within the aquifer protection area. Other uses such as medical office or hair salon would be more of a concern due to the type of wastewater discharges associated with these uses. We are also concerned with the amount of impervious surface proposed on this site. The overall cumulative effect of increasing impervious surface areas within the watershed area can directly affect the recharge capability of the aquifer and affect water quality and stream flow characteristics through increased stormwater runoff and decreased baseflow.

To minimize the loss of aquifer recharge from the increase in impervious surface and potential water quality concerns associated with stormwater runoff (metals, oil), we recommend impervious surfaces be minimized, pervious pavers be used where appropriate (pedestrian walkways) and stormwater runoff be managed through overland flow (grass swales) to maximize recharge to the aquifer. To the extent possible, rain gardens and/or drywells should be used to capture roof runoff for discharge into the groundwater. Also vortecnicns should be utilized for treatment of stormwater. These issues need to be addressed during the design stages of the project.

We would be opposed to the use of a sub-surface infiltration system within the Level A aquifer area to manage stormwater on this site. While we tend to support efforts that minimize losses in aquifer recharge, we would be very concerned with the quality of the stormwater runoff (metals, oil) that would be directly discharged in the aquifer.



The site plan shows the site will be served by an advanced wastewater treatment facility and leaching field. Without detailed information on this system, it is difficult for us to determine potential impacts to groundwater quality. We would appreciate receiving detailed information on this system for our review and comments.

The site plans show several stormwater drainage pipes that will directly discharge into the wetland area of the Indian River with no pre-treatment. Section 19-13-B32(i) of the Regulations of State Agencies requires stormwater pipes to terminate at least 100' from a wetland area that is located within an aquifer area. The location of the stormwater pipes will need to be redesigned to comply with this regulation. A stormwater treatment system, such as basin with grass swale, should be provided at the outlet of the stormwater pipes.

The site plans show recreational fields may be located on the site. We are concerned with potential impacts from stormwater runoff associated with the application of lawn care chemicals on the playing fields. An Integrated Pest Management program should be developed to minimize the need for the application of these types of chemicals on the recreational fields.

Due to potential effects to groundwater quality, we recommend the use of pesticides/fertilizers to maintain landscaped areas be minimized. The use of sodium chloride as a deicing agent should be prohibited and the use of any deicing agent be minimized. We also recommend a schedule for the yearly inspection and maintenance of catch basins and other stormwater structures be noted on the site plans and emergency spill control equipment be maintained on-site during construction activities.

Source protection is a vital concern of Connecticut Water and we appreciate the opportunity to comment on proposals that may affect our sources of supply.

Sincerely,



Cindy F. Gaudino

Manager Source Protection and
Real Estate

Cc: R. Ross