

Connecticut Water Company  
93 West Main Street  
Clinton, CT 06413-1600  
Customer Service: 800.286.5700



VIA EMAIL

March 2, 2020

Sherry Hynes  
Planning and Zoning  
Town of Clinton  
54 E Main Street  
Clinton, CT 06413

**Re: Indian River Shops, 11 Killingworth Turnpike**

Ms. Hynes,

The Connecticut Water Company (CWC) has been provided with revised plans, dated 2/7/2020, and a letter from Fedus Engineering, dated 2/27/2020, which address some concerns included in CWC's letter dated 2/4/2020.

As stated in CWC's 2/4/2020 letter, a primary concern for such a development is the proposed movement of water from inside to outside of the APA. While the revised plans do not show the boundary of the aquifer protection area (APA) on the Overall Grading Plan (preferred), CWC was provided with an informal grading plan showing the limits of the APA, rain gardens, underground infiltration, existing CTDOT discharge points, and drainage areas impacting the APA (see attached Aquifer Protection Area Exhibit).

After reviewing that Exhibit, it appears that the proposed movement of water outside the APA is negligible, especially since the underground infiltration proposed for the roof runoff for building 3S was relocated from the outside of the APA to inside.

To further protect the APA recharge area, we strongly recommend that 'low impact development' features are incorporated into the Landscaping Plan, such as depressed parking lot medians coupled with curb-cuts to capture parking lot runoff and pervious sidewalks. We would appreciate the opportunity to review the Landscaping Plan (and Integrated Pest Management Plan if proposed). The boundary of the APA should be included on the Landscaping Plan.

While we understand emergency spill supplies will be kept on site, it is important that refueling and other equipment maintenance occur outside of the APA as recommended by the Connecticut Department of Energy and Environmental Protection's (DEEPs) *Best Management Practices for Temporary Construction and Reconstruction Operations in Aquifer Protection Areas* guidance document (attached). To assure compliance, we recommend that an Emergency Spill

and Response Plan be developed and designated refueling/maintenance areas (if the activity is anticipated) be shown on the plans outside of the APA.

It appears in some areas that the edge of the wetland are still less than 25-feet from the proposed improvements. We recommend at least a 25-foot protection buffer be established along all wetland boundaries.

The revised plans do not show deep catch basins, which are recommended by DEEPs *Best Management Practices for Controlling Stormwater in Parking Lots in Aquifer Protection Areas* guidance document (attached). CWC has however spoken to the project engineer who has confirmed that details for four-foot sump pumps with hoods on the outlet pipes will be added to the plans.

All of our other concerns included in our 2/4/2020 letter have been addressed.

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

Sincerely,



Jessica Demar  
Environmental & Regulatory Compliance Coordinator

CC: Greg Fedus, Fedus Engineering, LLC