



May 13, 2024

Ms. Lynette Wacker
Assistant Town Planner / Wetlands Agent
Old Saybrook Town Hall
302 Main Street
Old Saybrook, CT 06475

RE: Proposed Retail Center, 52 Spencer Plain Road (Route 166)

Ms. Wacker,

I have reviewed the site plans and associated documents prepared by Indigo Land Design for a proposed medical office building at 52 Spencer Plain Road. I have the following comments:

1. The proposed development includes direct wetland impacts to the two western wetlands (1,540 square feet of temporary disturbance and 1,851 of permanent impact) and activity within 16ft of the eastern wetland. A compensatory wetland mitigation is proposed of 2,165 square feet.
2. Direct impacts are associated with the low functioning/low value northwestern and southwestern isolated wetlands. As was established during the previous development application, access into the Site necessitates some level of direct impact to these two wetlands. The Applicant should reconfirm that with this new development plan, such impacts remain unavoidable.
3. Development activity is very close to the high-quality eastern wetland (min. 16ft). Design modifications should be considered to maximize that buffer distance at this closest encroachment point, such as a retaining wall along the limit of the rear access drive. Additional buffering, even if it would result in additional impact to the low-quality western wetlands, should be considered.
4. According to Page 5 of the Drainage Report, the Water Quality Volume (WQV) modeling for the stormwater basin was based on the 2004 Connecticut Stormwater Quality Manual as opposed to the current 2024 stormwater manual. The 2024 manual has increased the WQV from 1" to 1.3" to reflect the more intensive rainfall pattern Connecticut now

receives. If this is correct, it is recommended that the basin modeling reflect these current standards to ensure the basin is appropriately sized to treat the WQV.

5. What activity causes the temporary disturbance in the northwest and southwest wetlands, as no grading is proposed at those locations?
6. I would echo Comment #4d from Jacobsen, that the proposed increase in stormwater runoff volume to the eastern wetland should be avoided, particularly considering downstream flooding issues.
1. I would echo Comment #2 regarding the southwest wetland and its use for stormwater detention. Additional details should be provided as to the effect of this action on the wetland hydroperiod, hydrology and plant community, as it is likely to alter three characteristics.
7. Would pre-treatment with hydrodynamic separators improve the quality of water being discharged to the eastern wetland?
8. For the proposed erosion control blanket, biodegradable materials are recommended, as non-biodegradable materials can trap small wildlife in perpetuity.
9. Consider alternatives to geotextile silt fencing being proposed for work within the northwestern and southwestern wetlands, as it is not appropriate for in wetland work, and requires additional soil disturbance (from trenching) to properly install.
10. Confirm that the proposed lighting plan, showing cutoff fixtures, is dark skies compliant.
11. Regarding the Landscape Plan:
 - a. Native plantings are recommended along the LOD, particularly bordering the eastern wetland. Eastern Wetland Buffer plantings are noted on Sheet ES-1 but not on the Landscape Plan.
 - b. There is a discrepancy between Sheet ES-1 mitigation wetland plantings and landscape plan planting callout.
 - c. The plan includes a wetland seed mix and a detention basin seed mix. Clarify what mix will be applied at what locations.

If you have any questions regarding my findings, please feel free to contact me.

Respectfully submitted,



Eric Davison
Wildlife Biologist
Wetland Scientist
Registered Soil Scientist