

August 20, 2025

Woodbridge Town Plan & Zoning Commission
Woodbridge Town Hall
11 Meeting House Lane
Woodbridge, Connecticut 06525

Re: Intervenor Comments & Applicant Responses
804 Fountain Street, Woodbridge, Connecticut

Dear members of the Commission:

On behalf of the Applicant, Fountain Ridge, LLC, we provide below responses to comments provided in a letter by Rema Ecological Services, LLC (REMA), dated June 2, 2025. Our evaluation also included a review of the following documents:

- The *Proposed Residential Development* plan set, prepared by Solli Engineering, dated August 18, 2025.
- The *Engineering Report*, prepared by Solli Engineering, dated August 18, 2025.

The following includes comments provided in the *Preliminary Application Review* letter-report, and our associates' observations. Italicized text below has been directly copied from the REMA report.

1.0 Water Quality Concerns

Comment 1: *The stormwater section of the application does not address discharges towards and potential adverse impacts to these (West River Watershed & Yale Nature Preserve) sensitive off-site receptors. Is there drainage under Route 15, into the Yale Nature Preserve? What is the level of treatment from street drainage from this area, and the anticipated pollutant-loading, discharging into the West River?*

Response 1: The state has curated and published the *Stormwater Quality Manual* to protect waters of the state from indirect adverse impacts to sensitive systems, such as inland wetlands and watercourses. By following these regulations and guidelines, land can be developed without adversely affecting wetlands and watercourses, including those found in the Yale Nature Preserve and the West River, downstream of the site. In accordance with the CT DEEP 2024 *Connecticut Stormwater Quality Manual* and the town of Woodbridge regulations, stormwater generated from the proposed impervious surfaces at 804 Fountain Street will be captured, treated, and infiltrated through subsurface stormwater management systems and into the soil surface during typical storm events. The extensive treatment train, which includes roof leaders, catch basins, rip raps, hydrodynamic separators, subsurface infiltration chambers, and controlled overflow outlets will serve to treat, slow, and infiltrate stormwater generated from impervious surfaces during typical and frequent storm events. During larger storm events, after passing through the proposed systems, overflow will outlet via a riprap located in the uplands, outside of the 100-foot upland review area, before either infiltrating into the soil surface or traveling downslope as sheet flow.

The system meets local and state regulation standards and as such no adverse impacts from stormwater discharges are likely or anticipated.

An existing culvert situated on the adjacent DOT land conveys water beneath Route 15 and outlets onto the Yale Nature Preserve. Stormwater along Fountain Street appears to be captured by catch basins and conveyed onto the northeastern portion of the adjacent DOT land and onwards onto Yale Nature Preserve. There are no apparent formal measures to treat stormwater generated from Fountain Street or runoff from the Wilbur Cross Parkway before being conveyed as point discharge directly into the Yale Nature Preserve.

Stormwater derived from Fountain Street, captured by catch basins and conveyed into the abutting DOT land appears to be entirely untreated. While the site is within the West River watershed, the site is separated from the West River by the Wilbur Cross Parkway, Yale nature preserve, Yale university golf course, and heavily developed residential areas and commercial areas. Stormwater from the proposed development will be captured and treated in accordance with town and state requirements. The primary treatment mechanism will be infiltration through the onsite soils of stormwater runoff from the frequent and small storms and from the first flush of larger storms. As such, this water will travel below grade for an extended distance before being slowly released as clean and cool groundwater discharge. This accounts for more than 90 percent of stormwater runoff and ensures the protection of downstream wetlands and watercourses.

Comment 2: *...the potential for erosion from the hillside during the early stages of the project is of grave concern, due to the steep slopes and the erosible soils.*

Response 2: A phased *Soil Erosion and Sediment Control Plan* is included with the proposed project, featuring best management practices such as sediment traps, silt fencing backed with haybales, and anti-tracking pads to be maintained throughout the duration and various stages of construction. The Plan has been designed in accordance with the CT DEEP 2024 *Connecticut Guidelines for Soil Erosion and Sediment Control*. According to the Soil Erosion & Sediment Control Notes found on sheet 2.41 of the project plans, sediment and erosion control measures will be installed and maintained in effective condition throughout the duration of the construction period and all siltation fencing will be inspected at a minimum weekly or after each rainfall and replaced as necessary. These sedimentation and erosion control measures, curated to specific stages of construction from demo to completion, will capture and contain any eroded sediment upslope and outside of inland wetlands and watercourses. The proper installation, monitoring, and ongoing maintenance of proposed sediment and erosion controls will serve to prevent adverse impacts to critical resources (i.e. wetlands and watercourses) during all stages of the project.

Comment 3: *Soil erosion will increase substantially after trees are felled, and as the overburden is removed and in the early stages of excavation. The fine sediment fraction takes a week or more to settle out in a temporary sediment basin; it passes through stretched silt fence mesh, and it is also is not removed, in the post construction phase, by any of the swirl separators using centrifugal force. Fine sediment that reaches the roadway stormwater system carries*

excess nutrients, especially phosphorous and adsorbs toxicants and fosters eutrophication and invasive proliferation in downgradient wetland and watercourse resources.

Response 3: As previously discussed, an extensive *Sediment Erosion and Sediment Control Plan* is included with the proposed project. The proper installation, monitoring, and maintenance of proposed sediment and erosion controls will serve to prevent adverse impacts to critical resources (i.e. wetlands and watercourses) during all stages of the project. During monitoring, should fine sediment fraction be suspended within constructed sediment traps and suspected of potential migration through silt fencing mesh, WKA recommends the utilization of polymer flocculants to accelerate the settling of fine suspended sediment.

2.0 Special Natural Features

Comment 4: *The pond itself (Bishops Pond) and the ridge crest straddle the site's western boundary. They are important natural features that are currently in excellent condition. The ridge crest has multiple exposed bedrock outcrops in the Maltby Lakes metavolcanic complex per the Bedrock Geology Map of Connecticut (Rodger 1985). It has varied and interesting mineralogy and flora (mosses, lichens, and vascular plants), with high educational and scientific research potential. It is partly on the site, and partly on Land Trust property. The distinctive plant communities on open or partly shaded rock outcrops, whether subacidic or acidic, are designated as Critical Habitats by CTDEEP, unusual ecological communities with elevated likelihood of uncommon and rare species.*

Response 4: As stated in the *Preliminary Application Review* prepared by REMA, "runoff from the site into Bishops Pond is not an issue..." The proposed project will not adversely affect Bishops Pond. Likewise, the summit of the onsite portion of ridge crest, which is in excellent condition and straddles the sites western boundary, present both onsite and on adjacent land trust land, is outside of the limit of development; its uppermost extent will not be disturbed during construction. The site is not in an area designated by CT DEEP as Critical Habitat and during reviews by both WKA and REMA, no vegetative species of special concern, threatened species, or endangered species were located or identified. No adverse impacts to the upper limits of the ridgetop or Bishops Pond are proposed and no adverse impacts to state listed floral species are anticipated to occur from the proposed project.

3.0 Impacts to Ecological Communities

Comment 5: *Although runoff from the site into Bishops Pond is not an issue, the loss of several acres of forest would be required for the proposed project on the east side of the ridge crest, with its series of sensitive, ecologically valuable bedrock outcrops. This forest loss will have major adverse impact[s] on its (the property's) air quality. It will also reduce air quality in the nearby Yale Nature Preserve. The project will also reduce wildlife usage and ecological integrity in these preserved areas, cause invasive infestation, and much diminish potential use as a scientific-educational-aesthetic site.*

Response 5: The redevelopment of the site, which was previously utilized as a residential and agricultural property, with a decrepit house still standing, will preserve the high-quality ridge top habitat on and off the site and will mostly occur in common woodland habitat with an abundance of invasive vegetation. To avoid impacts from air pollution and invasive vegetation, we have recommended, and the Client has agreed to, the project design drawings being expanded to include an invasive vegetation control plan, evergreen tree buffers, and forest restoration. Furthermore, with the Wilbur Cross Parkway extending between the project site and the Yale Nature Preserve, the Preserve will not be affected by air pollution as a result of the proposed development and will remain forested. While wildlife usage in the direct location of the proposed development will decline, an abundance of forested land is within the immediately accessible vicinity of the project site. Naturally vegetated areas will border the development site and allow for wildlife movement through the site and to adjacent sites. As a privately owned property, the potential for use a scientific-educational-aesthetic site is at the disclosure of the property owners. However, publicly accessible land with similar features is present on the Land Trust land immediately to the north, immediately across Fountain Street and is present in the Yale Nature Preserve nearby.

Comment 6: *The ridge crest community, both onsite and off-site, will be degraded by invasives without the protective barrier of hundreds of feet of tall mature forest.*

Response 6: Onsite, to avoid impacts from air pollution and invasive vegetation, we recommend that the project design drawings be expanded to include an invasive vegetation control plan, evergreen tree buffers, and forest restorations. Under existing conditions, slightly downslope and directly northeast of the ridge crest, there is an area currently infested by Chinese Wisteria, Japanese Knotweed, and some burning bush. This area is onsite and well away from the DOT ROW associated with the Wilbur Cross Parkway. It is located between Fountain Street and the ridge line, in close proximity to the ridge crest. Species like Chinese presumably will continue to infest the remainder of the ridge crest if left unchecked. The invasive control plan will be prepared and serve to minimize the potential for invasive vegetation migration to the greatest extent practicable. Likewise, the proposed planting plan does not include invasive species and the development itself will serve as an artificial barrier between invasives which infest the lower portion of the property and the DOT land from the upper ridge crest community.

Comment 7: *The loss of several acres of mature forest will also eliminate the existing excellent filter for air pollutants generated by large volumes of heavy traffic along route 25.*

Response 7: A planting plan featuring an abundance and diversity of native plant species will assist with revegetating portions of the property. The plan, which is currently primarily native species, does not include any invasive species. Additionally, at the commission's discretion, the Client would be pleased to exchange any of the limited proposed non-native decorative plantings for native alternatives. The preparation and implementation of the invasive control plan, evergreen plantings, and forest restoration will work in conjunction to limit the decline of unaffected portions of woodland, will provide an evergreen buffer with a large surface area to assist in attenuating pollutants, and will serve to restore portions of impacted woodlands. The Wilbur Cross Parkway extends between the project site and the Yale Nature Preserve, the

Preserve will not be affected by air pollution as a result of the proposed development and will remain forested.

4.0 Conclusion

Comment 8: *Based on our preliminary analysis, as proposed, there is a reasonable likelihood of unreasonable pollution and destruction of natural resources and unique natural features both on site and off-site.*

Response 8: The proposed development is designed in such a way as to avoid unreasonable pollution, impairment, or destruction of natural resources such as inland wetlands and watercourses and the onsite ridge crest. The habitat and flora and fauna that are present in the northern portion of the property are not threatened or endangered or protected by state or federal law. No development activities are proposed within 100 feet of inland wetlands or watercourses. Further, during construction, soil erosion and sediment control best management practices, as described in the *Connecticut Guidelines for Soil Erosion and Sediment Control Manual*, to prevent short-term indirect adverse impacts to inland wetlands and watercourses. Stormwater falling upon proposed impervious surfaces will be captured and treated and mostly infiltrated into upland soils, in accordance with the *2024 Connecticut Stormwater Quality Manual*. The project includes the installation of an abundance and diversity of native trees, shrubs, and ground covers and will include measures to control the spread of invasive vegetation. With the implementation of sediment and erosion controls during construction, management of stormwater following construction, the implementation of the planting plan, and the recommended invasive control plan, no unreasonable pollution, impairment, or destruction to natural resources or unique natural features on site or off site are anticipated to occur as a result of the proposed project.

Thank you for your consideration of this information. If you should have any questions or comments, please do not hesitate to contact us at (203) 366-0588.

Sincerely,



William L. Kenny, PWS, PLA
Principal



Andrew Delach
Ecologist