

Patricia Monahan 50 Lakeview Dr

Good Evening Chairman Moulson and members of the Inland Wetlands and Watercourse Commission.

Let me first thank each and everyone of you for your volunteering your time and service to the taxpayers of Preston CT. Much appreciated. If I may I will refer to you as IWWC.

Section 1.3 of the IWWC regulations summarizes the direction and charge of the commission.

It states the purpose of these regulations to be for the protection, preservation, maintenance and use of the inland wetlands and watercourses by minimizing their disturbance and pollution; maintaining and improving water quality in accordance with the highest standards set forth by Federal, State or Local authority; preventing damage from erosion, turbidity or siltation; preventing loss of fish and other beneficial aquatic organisms, wildlife and vegetation and protecting the quality of wetlands and watercourses for their conservation, economic, aesthetic, recreational and other public and private uses and values, providing an orderly process to balance the need for economic growth of the Town of Preston and the use of its land with the need to protect its environment and ecology destruction of the natural habitats thereof; deterring and inhibiting the danger of flood and pollution.

- The Blue Camp CT LLC application calls for the disturbance and or destruction of over 11 acres of wetlands while these regulations call for the protection, preservation, and maintenance of the wetlands.
- Opening up a 36 acre pond and its surrounding wetlands and watercourses to a potential population of over one thousand people per day would not be consistent with maintaining and improving water quality.
- A land transaction recorded in Vol 46 Page 176 and a land warrantee recorded in Vol 46 Page 429 referencing Map # 176 dated 8/24/1960 recorded 10/26/1960 gives lots 1-50 rights to use the waters of Avery Pond in common with others. Lots 1-50 are all the lots on both sides of Lynn drive plus those that abut on Rt 164. These Preston residents have deeded rights to Avery Pond, those same deeded rights do not appear in the deed for parcel numbers 451,455, and 495 Volume 105 Page 995. The properties on Overlook Drive, Tanglewood Drive, Deerbrook Road and Meadow Lane were also developed by Country Squire Homes Inc. All or some of these may have the same deeded rights.
- This 36 acre pond has depths of 3 to 9 feet and very fragile trophic conditions. At least 50 families have deeded water rights in common to Avery Pond. The applicant states recreational activity opportunities are a critical component of their success. The applicant is proposing to encourage kayaking and canoeing on Avery Pond, available for rent at the campground. Yet I have not seen the carrying capacity of Avery Pond calculated or disclosed, in any of the project analysis.
- A cyanobacteria bloom was identified at Avery Pond, by a citizen scientist last summer, we are awaiting confirming results from EPA.
- There is a fish migration path that allows alewives to journey from Long Island Sound to the Thames River to Avery Pond and Amos Lake to spawn. The journey includes Indiantown Brook which encroaches on parcel 495 This should be viewed and treated as a sensitive area not to be disturbed. You may recall the fish ladder installed

in December of 2012 in cooperation with the Piela family. That was part of this project to ensure this important food source remains.

- The sharp-shinned hawk a Connecticut endangered species has been recorded at Avery Pond. It is not uncommon to see one to three eagles, a state threatened species at Avery Pond. Avery Pond is home to Osprey, Eagles, Herons, and Cormorants all having a main food source of fish. The current wildlife would not be able to compete with overcrowded watercourses, destruction of their natural habitats, and would seek new resources or parish. See Schedule A attached (Schedule A contains supporting documentation to the endangered and threatened and thriving species of Preston)
- References <https://portal.ct.gov/DEEP/Wildlife/Learn-About-Wildlife/Connecticut-Endangered-and-Threatened-Species-Fact-Sheets> and <https://ebird.org/hotspot/L2501132?yr=all&m=>
- All the properties on Lynn Dr are low lying and many are in a flood zone. Certain alteration of the terrain could exasperate their current conditions.
- The removal of snags can negatively impact wildlife populations that are dependent on them as essential habitat components. Cavity nesters evolved in unmanaged forest stands where snags developed naturally. Snag and den trees are becoming short in supply as forests are being intensively managed, whether through cordwood cutting, timber management or land clearing. These activities tend to accelerate the removal of existing snags and diminish the probability of trees ever becoming large enough to serve as possible snag or den trees. Insectivorous birds such as woodpeckers and nuthatches depend heavily on snags as a source of food. These birds, in addition to being an integral part of our natural ecosystem, are very beneficial in helping to control unwanted insect pests.
- Wood campfires release toxic gases, carbon monoxide and carbon dioxide which both pollute the air heavily. Propane fireplaces emit toxic gasses including carbon monoxide and nitrogen dioxide. Multiplied by 304 sites this could have a huge impact on the neighborhood.
- Page 6 of the Stormwater Management report states "long-term (post construction) treatment has been provided through the use of Low Impact Development principals. Page 3 Proposed Conditions of the stormwater management plan reads, The stormwater from this watershed will discharge to Avery Pond, Indiantown Brook and wetlands. I understand some of this is consistent with the existing watershed. However, that's old school and not consistent with low impact development best management practices. Current LID best management practices prohibit of use natural water bodies as stormwater treatment devices. Using existing creeks, streams, lakes or ponds to help remove pollutants from stormwater runoff is called in-stream treatment. The Clean Water Act expressly prohibits the use of in-stream treatment as a pollution treatment system except in the most extreme situations.
- LID is based on an adherence to eight main principles CONSERVATION DEVELOPMENT, MINIMIZE SOIL COMPACTION, MINIMIZE TOTAL DISTURBANCE, PROTECT NATURAL WATER FLOWS, PROTECT RIPARIAN BUFFERS, PROTECT SENSITIVE AREAS, REDUCE IMPERVIOUS SURFACES, AND STORMWATER DISCONNECTION. https://dec.vermont.gov/sites/dec/files/wsm/erp/docs/sw_gi_1.0_LID_series.pdf When these principles are used to plan/ design a development, they can help avoid potential environmental issues down the road. However, this project was not planned around the sites most significant resources. It plans to disturb wetlands and continue to pollute waterbodies with runoff. Some of these sensitive areas act as critical habitat. Wetlands are considered the most biologically diverse of all ecosystems, serving as a home to a wide range of plants and animals. The plan calls for a sizable amount of soil

compaction. When soils are damaged by compaction the ability of microbes to perform key functions such as nitrogen fixation, the phosphorus cycle, pollution immobilization, and mineralization is compromised. Reducing paving and soil compaction helps to curb surface runoff and peak discharge volumes. Stormwater disconnection, disconnecting impervious surfaces from the hydrologic cycle and capturing in a cistern system has many benefits. Under natural conditions, water initially flows along the land surface as sheet flow, eventually concentrating in small valleys and depressions, such as wetlands. As a result, peak flows are minimized, infiltration is maximized, pollutants are reduced, and groundwater recharge and storage are increased. This application proposes to upset the natural conditions. Including 277 RV parking pads with connecting roadways, increases impervious surfaces. Best practices call for a reduction. As reduced impervious surfaces provide for less stormwater runoff, the volume of water entering the storm drain system and the amount of revenue needed for operation and maintenance is decreased.

- And the last line Of the IWWC regulations "in order to assure to the people of the Town of Preston, the safety of such natural enjoyment of generations yet unborn."
 - Displacing the Osprey, Eagles, Herons, and Cormorants, and other wildlife such as describe by Joseph R Theroux, Certified Forester and Soil Scientist, aquatic organisms, fish etc. is denying generations yet unborn.

If you feel this applications merits approval, please consider the following modifications;

- Deny development of Glamping area 1 & 2 and the 23 back-in RV sites in the eastern portion of parcel 495. As construction of such requires disturbance to the wetlands to construct and post construction runoff flows directly to the wetlands. Removing 50 sites still leaves 254.
- Require porous concrete parking spaces and road ways over asphalt.
- Require the applicant to monitor the Indiantown Brook migration pathway and Avery Pond twice a year using an approved qualified laboratory quality assurance project plan. Mid-lake deep hole depth profile for temperature, dissolved oxygen, pH, conductivity, and turbidity. Nutrient Concentrations: nitrate, phosphate, and chlorophyll A at the surface, and bottom. As well as cyanobacteria monitoring.
- Deny the boardwalk and floating dock direct access to the Avery Pond, ensuring non disturbance of the shoreline. Allow a viewing screen to be set back from the shoreline. Campers can walk over the viewing screen platform preventing the flora and fauna communities from being disturbed by human activities. These passive recreational activities place minimal stress on a site's resources; as a result, offering some unique benefits, like the protection of natural resources and the restoration of ecosystem services. Incorporating the history of the site and wildlife education, will also provide educational opportunities that celebrate the region's heritage. The viewing screens also offer privacy to the existing neighborhood. A properly built viewing screen would have less impact on property values and would also serve to soften some of the noise.
- Deny the use of wood or propane fireplaces, that heavily pollute the air, due to the proximity to the existing school and neighborhoods.
- Require all of snag and den trees remain in tack, no removal of such trees.

To include motorize watercraft is prohibited

- That the permanent maintenance schedule reflect the recommendations of Benesch's experts. I've attached schedule B outlining the differences and recommendations.
- Revise the proposed development to increase the distance of the disturbance and development from the wetlands and watercourses to 50 feet or more to provide for a larger riparian corridor to reduce this impact to the upland habitat. Post the wetland boundaries with permanent signage indicating the inland wetlands boundary/do not encroach, at eye level with approximate spacing of 25 feet. As recommended by Joseph R Theroux, Certified Forester and Soil Scientist.

Schedule A

Search 2:17 PM 25% Preston Com...

Mar 6 · 📷

3/6/21 Amos Lake - Eagle feasting on a Canada Goose... feathers flying everywhere!



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Search 2:19 PM 24% Preston Com...

Melanie Scheuermann Feb 26 · 📷

Route 164 near library. Awesome sight.



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Search 2:29 PM 18% Preston Com...

Ian Stammel Dec 29, 2020 · 📷

Three bald eagle just hanging out on the thin ice in the middle of Avery pond. They have been here for atleast the past few days. I've never seen three before. It's a terrible picture cuz they are so far away.



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Search 2:27 PM 20% Preston Com...

Susan Bennett Hotchkiss Jan 18 · 📷

Backyard eagle....took off just after I stopped recording. Avery Pond.

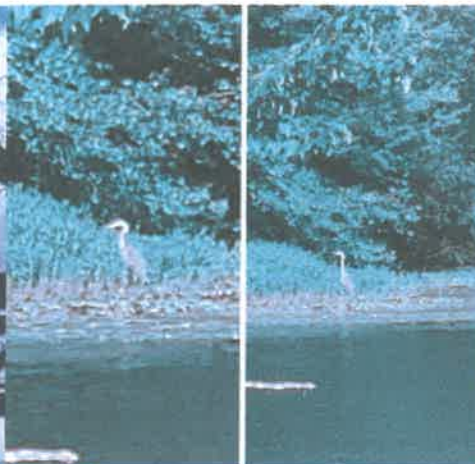


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Search 8:49 AM 95% Preston Com...

Amanda Mercado Jun 17 · 📷

Beautiful blue heron living in Hallville Pond. What a beautiful view from our front yard



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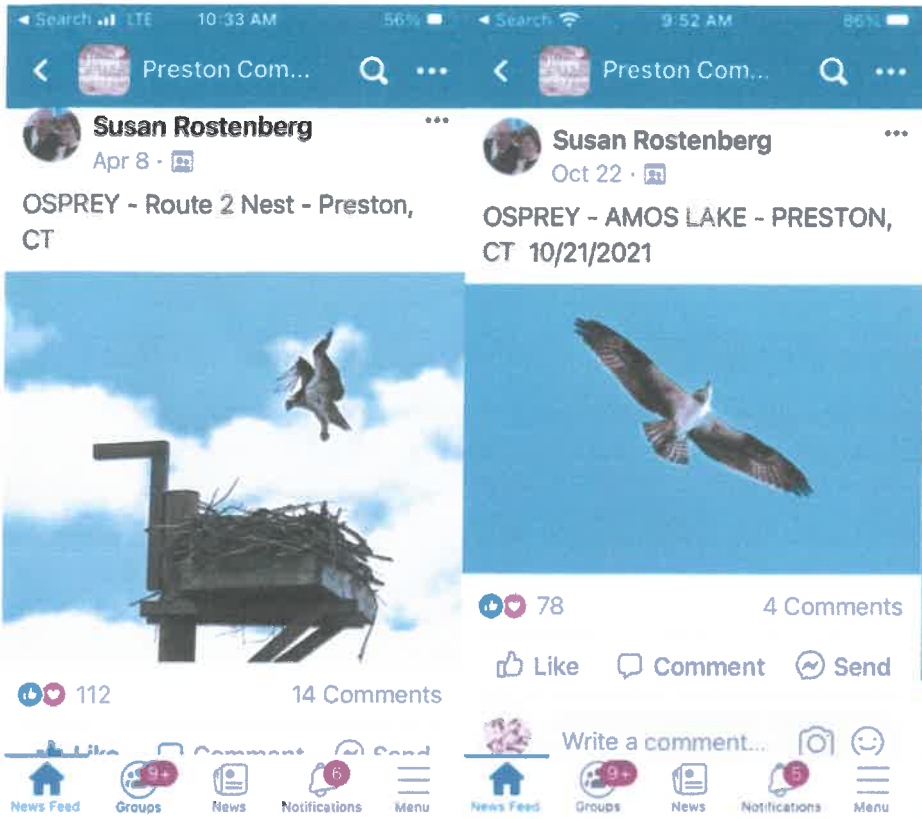
Search LTE 10:13 AM 68% Preston Com...

Susan Rostenberg May 24 · 📷

Great Blue Heron - Amos Lake - Preston, CT



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King fisher

Mallard

Schedule B

Differences of the PERMANENT MAINTENANCE SCHEDULE between the Applicant and the storm management report provided by Benesch. Both documents provided by the applicant.

- Pages 19 & 20 Application Pages 8 & 10 Stormwater Management Report
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- 1. All parking areas, roadways, sidewalks, driveways and other impervious areas shall be swept clean of sand, litter and other possible pollutants twice each year, once between November 14 and December 15 (after leaf fall has concluded) and once during the month of April (after the possibility of further sanding has ended). All material accumulated as a result of the sweeping activities shall be disposed of in accordance with law.
- Parking Lot and Driveway Sweeping: At least twice a year, with the first occurring as soon as possible after snowmelt and the second not less than 90 days following the first. Page 10 Stormwater Management Report
- Parking Lot and Site Cleanup: Inspect on a regular basis not to exceed weekly for litter and debris. Page 10 Stormwater Management Report
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- 2. The Applicant shall utilize a sand/salt mix of 80/20 for winter roadway and parking lot treatment. Since this project is a seasonal recreational campground, plowing, sanding and salting activities shall be kept to a minimum sufficient to allow maintenance personnel access to the site for off season maintenance activities.
- The seasonal nature of the development avoids the use of road sand and salt, which are the major contributors to run-off pollutants. This ensures the long-term performance of the stormwater treatment train and significantly reduces concern for contaminant discharges to the adjacent wetlands and groundwater. Page 8 Stormwater Management Report
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- 3. All catch basin sumps shall be cleaned at least once per year between the period April 15 and May 30. All material cleaned from catch basin sumps shall be disposed of in accordance with law.
- Catch Basins and Sumps: Maintenance includes removal of trash from the grate and the sump, as well as sediment from the sump. They shall be inspected semi-annually and cleaned when the sump is one half full of sediment. One of the inspections shall be after the snow and ice removal season is over, and prior to the spring rainfall events. If the sumps is filled more than half-filled with sediment at the semi-annual inspections, they shall be inspected quarterly. Page 10 Stormwater Management Report
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- 4. A monthly inspection of all stormwater structures installed within the project, including the sediment forebays and stormwater quality/detention basins and outfalls shall be conducted for floating or surface debris. Any floating or surface debris encountered shall be removed and properly disposed of.
- Landscaped Areas: Inspect semi-annually for erosion or dying vegetation. Repair and stabilize any bare or eroded areas and replace vegetation as soon as possible. Page 10 Stormwater Management Report
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- 5. Except during the grow-in period, the water quality/detention basins shall be inspected once per year. At each time that accumulated sediments in the sediment forebays attain a depth of 12", accumulated sediment shall be removed and disposed of in accordance with law. The water quality/detention basins shall be mowed once each year at the conclusion of the growing season. Page 19 Z:\Blue Water Development\Wetlands\Narrative.1.docx
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- Detention Basins/Rain Gardens: Inspect annually for sediment removal and disposition methodology. Cut back grasses semi-annually. Page 10 Stormwater Management Report
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- 6. The Applicant shall be responsible for compliance with all of the terms and provisions of this Narrative, including adherence to the maintenance requirements contained in this section hereof. Page 20 Z:\Blue Water Development\Wetlands\Narrative.1.docx
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- 7. During the first two (2) years subsequent to the completion of construction of the project, the Applicant shall inspect all downgradient discharge areas within the project for channelization subsequent to any storm event resulting in the deposition of in excess of 1" of rainfall. If channelization is occurring, the Applicant shall immediately retain the services of a certified soil and erosion control specialist in order to design remedial measures to diffuse the flow causing the channelization and shall forthwith implement the remedial measures designed by the certified soil and erosion control specialist. Page 20 Z:\Blue Water Development\Wetlands\Narrative.1.docx

• I am also attaching a land use academy fact sheet.

I respectfully submit a copy of my comments for the record,

Patricia Monahan


50 Lakeview Dr Preston CT