



Town of Coventry

Office of the Town Engineer

Todd M. Penney, P.E. - Town Engineer / Wetlands Agent

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Date: January 20, 2021

To: Coventry Inland Wetlands Agency

Re: Response/clarification to North Central Conservation District January 19, 2021 memo

CC: Debbieann Durkin, Applicant
Andrew Bushnell, Bushnell Associates
George Logan, REMA Ecological Services

Coventry is a member town of the North Central Conservation District (NCCD) and we will utilize their expertise on wetland applications for peer review. I requested a review from NCCD under the consideration that the application was deemed a significant impact by the Agency and felt it was prudent for all parties for this review. I received the memo on January 19th and read it through a couple of times. I believe after reading the memo it was important for me to provide a little clarification and/or qualifications for some of the memo's recommendation.

Wetlands/Watercourse Mapping Section

Emphasis on the lack of clarity for the mapping of the "embedded watercourses" for this wetland complex and the tributary for the Ash Brook.

1. *Tributary of Ash Brook*: For the record, George Logan identified a major portion of the parcel as the headwaters of Ash Brook, which is a *tributary* of the Hop River. The Report (and his testimony) reported an **intermittent watercourse** as running westerly from Bread & Milk Street, braiding and diffusing, only to concentrate back into an intermittent watercourse discharging in the southerly direction from the southerly parcel boundary. This intermittent watercourse within the wetland depicted on the plan is approximately 800 feet from the activity. I would suggest the location of that intermittent watercourse on the plan would be costly and not pertinent to the proposed activities.
2. *Eroded channel as watercourse*: The District is questioning the lack of classification of the drainage outfall by Mr. Logan. In my opinion: that point is mute for the following reasons:
 - a. Our wetlands regulations makes no distinction in wetlands hierarchy between a wetlands or intermittent watercourse.
 - b. The proposed activity requires disturbance through the wetland and the resultant intermittent watercourse no matter what.
 - c. The proposed culvert has been placed within the outfall channel so as not to realign the direction of the discharge within the wetland.
 - d. The observed presence of water from the outfall in my opinion is contributed largely from the Zeya Drive road underdrains and well as residential footing and underdrains that are tied into storm drainage infrastructure design to convey groundwater away from those structures. The District visited the site with an elevated groundwater table.

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Alternatives Analysis Section

No clarification necessary. It will be the Applicants responsibility during the Public Hearing to review the proposed alternative access to the development areas of the property and testify it is more impactful that the activities being sought for under the permit activities. It is my opinion, the applicant has proven with the proposed alternative that the application activities are the most feasible and prudent alternative to developing the site based on my review.

Mitigation Measures/Criteria for Decision/Conservation Easements Section

1. *Restoration/Creation of Wetlands*: I will be suggesting conditions of permit to see the successful implementation of these improvements via a separate memo to the Agency.
2. *Proposed Conservation Easements*: The District has provided its opinion on what portions would serve as the highest value for conservation easement. Ultimately, it is the Agency responsibility to determine what it decides to be the more valuable areas to conserve to mitigate the loss of the wetlands:
 - a. Wetlands that are protected by current wetland regulations, or
 - b. Uplands that abut wetlands that have less protection under the wetland regulationsThere is merit in both of these approaches. I am confident that the Agency will provide direction forward for the Applicant because of the Public Hearing testimony.

Additional Recommendations/Conditions Section

No comments.

TM Penney