

John Hall, Chair
Inland Wetlands Commission
Wilton Town Hall
238 Danbury Road
Wilton, CT 06897

June 28, 2018

Dear Mr. Hall and Inland Wetlands Commissioners,

I am writing on behalf of the Norwalk River Watershed Association (NRWA) regarding the WET#2519(S)-Wilton Heights—300 Danbury Road, Whitewood Lane--application for redevelopment of properties with two buildings that will consist of retail space and residential use within a wetland.

NRWA is a non-profit organization representing roughly 500 households dedicated to protecting water quality and wildlife habitat in the Norwalk River Watershed. Our mission includes advocating for the wetlands and watercourses of the seven-town watershed, which we agree are an “indispensable, irreplaceable, and fragile natural resource,” as Wilton’s Inland Wetland regulations state. We also agree that the preservation and protection of the wetlands and watercourses is in the public interest and is essential to the health, welfare and safety of the citizens of the town.

Given that the Norwalk River is an impaired waterway, which fails to meet the minimum standards set by the State for a Class B river and that Connecticut is experiencing more and longer periods of drought in recent years, NRWA feels it is increasingly important to advocate for protections of existing wetlands. The state is in the process of adopting a water plan for the first time in its history because of concerns about water supply. This increased focus on water as a vital and limited resource should also influence decisions at the town level.

With regard to the proposed Wilton Heights development, NRWA supports the goals of the developer to incorporate LID features such as rain gardens, green roofs, a filtration system, and a storm-water catch basin as well as to maintain the forest area behind the proposed development. Many of the of the properties along Route 7, as stated in Wilton’s 2010 POCD, “were developed before current limits on coverage were put into zoning. As a result, there are vast areas of impervious surfaces where little on-site infiltration can occur.... The Town should ensure that redevelopment improves conditions by reducing storm-water runoff.” Storm-water runoff is currently the leading cause of pollution in the river. Wilton has both the opportunity to, and the responsibility to, require improvements to sites along Route 7 when applications are presented to re-develop them. NRWA supports and encourages such redevelopment especially as it helps to revitalize

the town economically. While many aspects of this proposal promise potential improvements to the site, NRWA is concerned that a few aspects do not.

Aspects we support:

1. Redevelopment of an existing developed site as opposed to building on undeveloped land.
2. The reduction of peak-flow storm-water runoff of between 3-18% from the site and the improved filtration of that runoff through the addition of rain gardens.
2. The re-routing of runoff away from the brook and the disconnection of the pipes currently emptying directly into the brook.
3. The use of green roofs and other LID systems as a model for future development in town.
4. The re-planting of areas where houses are being torn down.

Our concerns include:

1. The increase in storm-water runoff caused by increases in impervious surface coverage from two acres to 3 acres. The proposed 40% site coverage will harm water quality. (According to CT DEEP studies, “even relatively low percentages (12%) of impervious cover upstream of a point on a stream can change stream dynamics enough so that the biological community will no longer meet aquatic life criterion goals.”) We understand that mitigating factors include the catch basin that will slow the water’s return to the river and the rain gardens that will filter the runoff, but we maintain that the increase in runoff still poses a definite threat to water quality over what is currently generated at the site. For the rain gardens used, we are concerned about their maintenance over time and would support the requirement of the property owner to submit an annual certification of maintenance to the town.

2. Encroachment into the 100-foot setback from the wetlands. The stream and healthy, vegetated wetlands that run through this property should be protected. Sources of clean water such as this wetland play a vital role in improving the water quality in the Norwalk River. Building in this wetland will degrade the quality of the water it contributes to the River. NRWA supports the redevelopment of the current footprint of the developed site, ideally with improvements made that increase the distance between the development and the wetlands where possible to a distance closer to the 100-foot requirement. For the second building on the Whitewood Lane site, we advocate for adherence to the setbacks and for every effort to be made to protect trees and other native vegetation, allowing for as much runoff as possible from the new buildings to stay on the site. No amount of rain gardens and catch basins can ever take the place of a healthy wetland, which, once it is lost, is gone forever.

3. Number of trees cut down and use of non-native plants in the forest area. NRWA supports preserving as many mature trees as possible, especially in the buffer area along the wetlands. For the plantings, we support the use of native trees and plants. We understand that some non-natives might be preferred for their hardiness along Route 7, but argue strongly that for the trees being planted in the woodland area, a mix of native evergreens and deciduous New England natives be used. Screening for neighbors is a

goal, we understand, but we think screening could be accomplished with native trees. NRWA, along with the Wilton Garden Club, the Wilton Land Conservation Trust, NRVT and Woodcock Nature Center, are working together to create the Wilton Pollinator Pathway. The Pathway runs along Route 7 from the town center, and we welcome Wilton Heights as a spot along it. The goal is the restoration of native habitat for pollinators, which are in sharp decline. Monarch butterfly populations are down 94% in the last 20 years, for example. Native trees and an avoidance of pesticides are vital to the survival of our pollinating bees, birds, butterflies and other insects as well as to protecting water quality.

NRWA supports the Inland Wetlands commission in its work assessing where and when development should be restricted in order to protect our community's water resources and wildlife habitat.

Sincerely,

Louise Washer, President
Norwalk River Watershed Association