

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

July 11, 2018

Dear Mr. Hall and Inland Wetlands Commissioners,

I am writing on behalf of the Norwalk River Watershed Association (NRWA) regarding WET#2508(S) ASML USA, LLC—77 Danbury Road—to demolish existing accessory building, relocate existing driveway, construct building addition and associated storm water management and utilities.

The ASML site is traversed by the Norwalk River and an unnamed tributary, and includes three acres of wetland, providing a corridor for wildlife. The concerns expressed below are driven NRWA's mission to improve the water quality and fish and wildlife habitats of the 40,000-acre Norwalk River watershed. Along those lines, we note that in developing its site, ASML is taking significant measures to manage storm water runoff, to remove invasive species and plant native flora, and stabilize riverbanks, and that the current project will actually reduce paved surface coverage. However, there remain some areas of concern which we list below. We understand some of these have been addressed or partially addressed, however we believe they are worth restating.

Concerns

- **A compromised riparian buffer zone.** Current zoning regulations require a 100-foot setback from a watercourse for new construction. ASML's current development plans penetrate far beyond that setback, and while we understand regulations for existing structures allow this, we are concerned about how very close some of the new construction is to the river.
- **Potential threat to wildlife both during and after construction.** To paraphrase Mr. Logan of REMA Ecological Services, speaking at the May 10 IWC meeting, "The river there is impaired, but has surprisingly abundant and diverse wildlife nonetheless." We urge ASML to keep this in mind and do everything in its power to protect it.
- **Loading docks right up against the river.** We are concerned about the potential for spills or other accidents given the close proximity to the river. It appears that the greatest potential hazard is from the vehicles themselves rather than the material being loaded. We urge ASML to take every measure possible to protect the river.

- **Storm water runoff and impervious surfaces.** While we understand ASML is making an effort to manage storm water runoff, the amount of impervious surface at the ASML site remains a significant concern. 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.”
- **Presence of storm water basins within the buffer zone.** While we understand ASML indicates that taking this approach represents an improvement over existing conditions, we wonder why not place the basins outside the buffer zone, which is customary? We understand ASML has agreed to eliminate one of the basins and enlarge the remaining basin which is further from the river’s edge. However, moving that basin out of the wetland would be an even better plan, as suggested by Mr. Shamas of VHB.
- **Flood plain issues.** While it has been noted that there hasn’t been a flood for 40 years in the area, it’s clear that the future holds a greater threat of this happening as the result of climate change. NOAA Atlas 14 predicts that the frequency and magnitude of extreme precipitation in our region will likely continue to increase throughout the 21st century. “Such changes could greatly exacerbate the societal impacts of extreme precipitation in the future.” Do the measures ASML is taking take this extreme climate outlook into account and could any toxic materials be released into the river in the event of a flood?
- **Thermal pollution as a result of limited tree canopy cover along the river and from storm water runoff.** This makes the river less hospitable to aquatic life and compromises water quality. We applaud the plans to capture and filter the runoff currently occurring from the parking lots and were glad to hear that more trees and shrubs will be planted along the riverbank. We would also like to encourage the planting of larger canopy trees where they are missing to help cool the water and stabilize the banks.
- **Maintaining a big picture perspective of the site.** We understand there are three projects at various stages underway at the site now – the new construction in question as well as a parking garage and another addition at the north end of the property. We urge ASML to maintain a big picture view of the property and continually look for ways to minimize negative impacts on the river and its watershed potentially resulting from the already dense site coverage and from disruptions to the site resulting from construction projects and their aftermath.

NRWA lauds ASML’s corporate focus on maintaining stringent environmental standards and using environmental resources in the most efficient way possible. By providing our input on its Wilton site plans, it is our intention to collaborate with ASML in helping to further that mission.

Sincerely,



Cathy Smith, Secretary
Norwalk River Watershed Association