



PO Box 7114  
Wilton, CT 06897  
norwalkriver.org

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

January 10, 2020

Dear Ms. Craig and Inland Wetlands Commissioners,

I am writing on behalf of the Norwalk River Watershed Association (NRWA) regarding the WET#2607(S) 200 DANBURY ROAD, LLC – 198 & 200 Danbury Road – proposed construction of a Mixed Use Development.

NRWA is a non-profit organization representing roughly 800 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.

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 frequent heavy rain events and longer periods of drought due to climate change, it is NRWA's position that it is increasingly important to advocate for protections of existing wetlands. The state has adopted a water plan for the first time in its history because of concerns about water supply, and Wilton has experienced the proposed threat of a new drinking water diversion that would decrease the flow of the river by up to 20 percent. This increased focus on water as a vital and limited resource should also influence decisions at the town level.

Keeping wetlands healthy and intact by adhering to the 100-foot setbacks recommended in town regulations--and as a minimum by the EPA--is vital to protecting water quality in part by helping to mitigate both extreme drought conditions and sudden rises in streamflow due to storm-water runoff. With regard to the proposed development at 198 & 200 Danbury Road, NRWA is concerned that plans include building extremely close to wetlands, as close as 11 feet, well within the recommended setbacks.

Another concern is that the proposed development is in an aquifer recharge area and would cover 51% of the site with impervious surface, slowing recharge and increasing runoff. Runoff from this site will feed directly into the Norwalk River. 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

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life criterion goals.” We understand that the plan includes a catch basin system which would slow the water’s return to the river, but such systems do not serve the watershed as reliably as natural wetlands. These systems must be installed and maintained correctly, they do nothing to remove salts and other contaminants from runoff, and they are not equipped to handle large storm events, which occur more often now. This system would also fail to handle accumulated snow from plowing. The proposed closeness of the development to the wetland would invariably result in snowplows pushing snow, along with road salts, oils and other pollutants, into or up to the edges of the wetland.

Our biggest concern is that we keep having to write this same letter regarding proposed development in Wilton which would require exceptions to be made to recommended setbacks from wetlands and watercourses. The cumulative effect of exceptions made in the past and those that may be made in the future poses a growing threat to the Norwalk River. Directly along the river, recent or proposed development includes the almost five miles of impervious roadway under Eversource wiring, two buildings near Trackside, the replacement of Young’s nursery with the Sunrise facility, expansions at the Y and ASML, the medical center across from town hall, the proposed Wilton Heights and a possible Mormon Church. These are all stresses on our already impaired river. We cannot afford to compromise the few intact wetlands we have remaining along the river.

As Wilton’s regulations describe wetlands, they are an “indispensable, irreplaceable, and fragile natural resource.” 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.

Thank you for considering these comments and for the work you all do to protect the Norwalk River and its surrounding wetlands.

Sincerely,

Louise Washer, President  
Norwalk River Watershed Association