

RJ O'CONNELL & ASSOCIATES, INC.

CIVIL ENGINEERS, SURVEYORS & LAND PLANNERS

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November 19, 2024

Ms. Stacy Radford
Zoning & Wetland Officer – Dept. of Land Use & Development
Town of Montville
310 Norwich-New London Tpke., Uncasville, CT 06382

Regarding: Response to Review Comments provided by CLA Engineers, Inc.
Inland Wetland Application 24 IWC 9
2268-2284 Route 32 – Horizon View
CLA-7873C

Dear Stacy:

RJ O'Connell & Associates, Inc. (RJOC) and Lucas Environmental (LE) are in receipt of the second round of peer review comments provided by CLA Engineers, Inc. dated November 14, 2024 for the above referenced project. We have reviewed the comments listed below in *italics* followed by our responses in **bold**. Comments that have been resolved are not included in this response letter.

4. *An alternatives analysis should be provided describing alternative options to achieve project goals and explain why these alternatives were not selected.*
 - a. *Response (RJOC): The wetland in question has been created from the discharge of the roadway drainage system located to the north of the property. This flow of water will need to be collected and conveyed around the proposed development whether the wetland is impacted or not. In order to ensure all of the off-site runoff is collected, a headwall needs to be utilized to ensure the off-site runoff is not able spill onto the project site and interfere with the stormwater management system designed to treat and attenuate the on-site stormwater. The headwall location was chosen as the most efficient way to collect this off-site runoff.*

The location of the headwall then presents the ability to allow vehicle circulation around the property, including emergency vehicle and garbage truck access. The vehicle circulation provides an increased level of convenience for the future residence of the property, as well as providing the amount of parking spaces to satisfy the zoning code.

New CLA Comment

- b. *The alternatives considered as noted above should be illustrated or documented with a descriptive narrative and quantified impacts. Detailed information should be provided on why each alternative was rejected in favor of the proposed development. Please provide this documentation for review.*

Response (LE & RJOC):

As noted, alternative designs were considered to further minimize direct impact to the onsite wetland area but were eliminated primarily because they failed to allow for the necessary emergency and vehicular traffic circulation around the building and/or the required parking for the project.

Please note that the grades of the existing wetlands area vary from approximately elevation 156 along the property line to approximately elevation 152 as you move away from the property line. Based on this it is also important to note that under any redevelopment alternative a drainage pipe and associated headwall (retaining wall) will be needed to collect and redirect the off-site stormwater runoff to the proposed detention basin.

To summarize, under the preferred alternative, the proposed project will result in 432 square feet of temporary impact and 636 square feet of permanent impact resulting from the construction of the headwall needed to redirect the off-site drainage to a proposed off-site stormwater detention basin. It is important to clarify and document that this wetland is the result of the Towns stormwater outfall discharging untreated stormwater onto the property. Mr. Thomas Liddy, LE Soil Scientist & Wetland Scientist, noted almost three feet of accumulated sediment within the wetland near the property line at the base of the slope. The depth of sediment decreases further away from the property line. Any redevelopment of this property would require complete excavation of the accumulated sediment, regrading, and restoration (reseeding) of the wetlands area.

As requested by CLA, the Applicant is providing more detailed explanation as to why the alternatives that avoids and/or reduces the permanent wetland impacts were eliminated for consideration as follows:

A No Wetlands Impact Alternative design has been prepared where the headwall (retaining wall) was relocated landward from the wetland boundary resulting in zero square feet of permanent fill associated with the headwall, drainage pipe, parking, and emergency vehicular circulation access road around the building.

This alternative is depicted on the attached exhibit titled “EX-1”, prepared by RJOC, dated November 19, 2024. Although this alternative results in zero permanent impacts, it does not meet the requirements of the project for the following reasons:

- This alternative results in the loss of 10 parking spaces.
- This alternative does not allow adequate passage and circulation for the emergency access road around the building.
- The loss in 10 parking spaces results in the reduction of approximately +/- 55% of the required visitor parking.

A reduced permanent impact alternative design was prepared where the headwall (retaining wall) was relocated landward from the wetland boundary while maintaining the emergence vehicular circulation access around the building. This alternative is depicted on the attached exhibit titled “EX-2”, prepared by RJOC, dated November 19, 2024.

Although this alternative results in a reduced permanent impact of approximately 130 square feet, it does not meet the requirements of the project for the following reasons:

- **This alternative results in the loss of 7 parking spaces.**
- **The loss in 7 parking spaces results in the reduction of approximately +/- 39% of the required visitor parking.**

Although both alternatives would result in temporary impacts of 1,068 square feet, which as outlined above, is required to remove the accumulated sediment, regrade, install the headwall, drainage pipe and seed the area with a wetland seed mix. It is important to note that the temporary impact associated with the sediment removal, regrading and modification to pre-existing drainage condition would be required as part of any redevelopment of the site.

In addition, while evaluating alternatives it is important to consider not only the magnitude of the impact but also the quality and function of the wetland resource area being impacted. The proposed permanent impact of 636 square is quite small relative to the entire 3.4-acre property. In addition, and as demonstrated in the wetland functional assessment and corroborated in the field with members of the Inland Wetland Commission, the quality of the wetland is quite poor and function extremely limited. It is our opinion that any temporary and/or permanent impacts to the wetland are being self-mitigated by not only collecting but also detaining the Towns stormwater in a constructed detention basin that will be actively maintained on-site by the landowner.

If you have any questions, please do not hesitate to contact me at 781-279-0180.

Sincerely,

RJ O'CONNELL & ASSOCIATES



Roy Smith
Vice President

cc: Honeycomb Real Estate Partners, LLC – Steve Caprio (electronic)
Tobin, Carberry, O'Malley, Riley & Selinger, P.C. – William Sweeney (electronic)
Lucas Environmental, LLC - Thomas Liddy (electronic)