



TOWN OF NEW MILFORD

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ORIGINAL

Office of Inland Wetlands Commission

January 16, 2008

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Connecticut Siting Council
10 Franklin Square
New Britain, CT 06051

CONNECTICUT
SITING COUNCIL

Robinson & Cole
280 Trumbull Street
Hartford, CT 06103-3597
Attn: Kenneth C. Baldwin

RE: Connecticut Siting Council, Proposed Telecommunications Facility
359 Litchfield Road, Northville Fire Department, New Milford, Connecticut

To whom it may concern:

The Town of New Milford Inland Wetland and Watercourse Commission has had the opportunity to review the proposed development plans and Application information for the aforementioned telecommunications tower that was submitted to the Connecticut Siting Council. During this review it was determined that the proposal will include regulated activities as defined in the Town of New Milford Wetlands and Watercourse Regulations. More specifically, construction activities, clearing and grading are proposed within 100 feet of a designated wetland area. This project will require an individual permit from the New Milford Wetlands Commission.

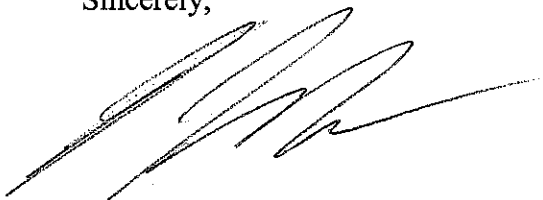
The project, as proposed, will cause significant disturbance to regulated area on a steep hillside above a tributary to the East Aspetuck River. The down slope brook has several pipes and culverts just down stream of the proposed development. Increases in runoff or diversion of water to this watercourse, which appear to be proposed, could exacerbate flooding or elevate pipe failure potential within the receiving watershed. In an effort to be proactive with your review and to help the applicant address pertinent issues, we offer the following items of concern:

- The Wetlands Commission will require pre and post drainage calculations for the proposed project to determine the amount of additional runoff that is created by this project and how it will effect existing drainage conditions.

- JAW19170
- The project does not propose any provisions for increased runoff. Dry wells for infiltration or retention/detention structures should be given consideration.
 - The plans depict a retaining wall that is 15 feet in height. This type of wall requires a specialized design. In addition, in the upland soils in the Northwest Hills of Connecticut, groundwater is anticipated at 3 to 8 feet depending on the soils types. The wall will require proper drainage.
 - The project as proposed will divert surface flow water and groundwater flow between two sub watersheds. A majority of the site area in its current condition does not flow to the nearby watercourse. The proposed wall will cause a flow diversion from the upland area and direct it to the watercourse further increasing flow.
 - The Commission is charged with reviewing “prudent and feasible alternatives” pursuant to State Statutes for those projects that may have a significant impact to wetlands and watercourses. We would recommend that the designing engineer shift the entire project about 40 feet toward the south along the hillside. This would not significantly change the design plan concept but would reduce the regulated area disturbance by about 75% and significantly reduce flow to the watercourse while obtaining the applicant’s objectives of constructing a telecommunications tower. During the review it was noted that the wetlands report that is enclosed as exhibit 12 to the Siting Council, contains a concept sketch that is more in line with the Regulations of the Town of New Milford and as such could be deemed a prudent and feasible alternative to the plan that is proposed.

We hope that both the Siting Council and the Applicant find these comments helpful. If you have any questions please do not hesitate to contact me at the wetlands office.

Sincerely,



James Ferlow
Town of New Milford Wetlands Enforcement Officer