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August 25, 2021

Jeffrey H. Folger
Environmental Planner
1540 Sullivan Avenue
South Windsor, CT

Re: App. #21-36P – Review of the proposed the 25 Talbot Lane Distribution Center site plan.

Dear Mr. Folger:

This letter is written to address your review comments dated August 18, 2021. Revised plans and supplemental reports have been submitted along with this response to comments. For ease of your review, your initial comment is in *italics*, followed by our response in **bold**.

The following concerns/comments were brought forth at the public hearing that a Commissioner would like responses to:

1. *Wetland delineation by John Ianni. Ianni's detailed report? See the On-Site Soil Investigation Report dated August 24, 2021 by JMM Wetland Consulting Services, LLC submitted with this letter.*
2. *Will there be a vehicle washing area? Demonstrate the runoff treatment from the vehicle washing, and hydrocarbon sequestration. There is not a designated vehicle washing area proposed with this plan. Any vehicle washing would occur off-site.*
3. *Air quality from idling diesels in the winter. The State of Connecticut DEEP regulations prohibit idling of all vehicles (truck, passenger vehicles, etc.) for more than three minutes, with few exceptions.*
4. *Predicted water table levels pre and post development. Impacts on residential basements. The development is expected to have negligible impacts on the water table in the surrounding residential areas. See the attached Exhibit Computed Effects on Groundwater Levels by GEI Consultants.*
5. *Develop and submit a Mosquito control plan. Mosquito Control Notes have been added to sheet C-D1 of the plan set requiring the use of a larvicide containing *Bacillus thuringiensis var. israelensis* (Bti) in appropriate areas of the site. Also, see the attached reports from the State of Connecticut Department of Public Health, the Centers for Disease Control and Prevention, and the National Institutes of Health documenting the safety of using Bti for mosquito control.*

6. *Comment on mosquito habitat pre and post development and anticipated population comparison.* The existing woodland site with scattered pockets of stagnant water are more likely to support mosquito breeding than the site post-development, especially given the above-referenced Mosquito Control Notes. See also attached Ecological Summary Report by GEI Consultants.
7. *Document dust control measures, explain item #5 on the Construction Sequence.* Item #5 in the Construction Sequence outlined on sheet C-ES5 discussed temporary seeding of disturbed soil that will remain exposed for longer than 30 days, as recommended in the 2002 Connecticut Guidelines for Soil Erosion and Sediment Control Section 5-3. This note has been revised to reduce the exposure limit to 14 days. Furthermore, Construction Dust Control Notes are also outlined on sheet C-ES5 that must be followed by the contractor in order to control dust throughout construction of the site. These notes have not changed since the original submission.
8. *Retention basin maintenance. Is aeration a good idea?* A fountain aerator will be installed in the open water portion of the water quality basin, as shown on the revised plans, to further discourage the development of mosquito larvae. Furthermore, this will introduce dissolved oxygen, which will improve the water and aquatic habitat quality within the pond.
9. *Give a more detailed analysis of the hydrology to maintain current water levels to the eastern portion of the watercourses.* The plans have been revised to route one roof leader from the eastern portion of the roof to the southern watercourse to maintain some hydrology. The attached Stormwater Management Report Supplemental shows that this approach will reduce peak flows for the analyzed storms for this Design Point, relieving concerns of downstream flooding while still providing hydration to this watercourse.
10. *The Prudent & Feasible alternatives presented are inadequate. All three are old and out of date and two are totally infeasible due to zoning allowances. Please provide P&F alternatives that are, at minimum, legally and technically feasible in today's market.* We believe the Industrial Concept prepared on 02-02-06 submitted at the last hearing, even though completed over 15 years ago, would comply with the Zoning Regulations in effect today. The concept is not feasible in today's market given the lack of demand for smaller industrial buildings and lots, which would not offset the expense of the public road construction required in this concept.

Furthermore, an additional concept dated 8/25/21 is attached that was developed using similar criteria as the plans under consideration with this application. The main criteria demanded in today's market for industrial buildings is for warehouses that maximize space with loading docks and truck courts on opposite sides of the building. In order to avoid direct wetland disturbance and to provide loading docks on each side of the building, a 152,280 SF building is the maximum size the site will support, less than half the size of the building proposed with the application. Since income for industrial developments is directly related to the size of the building, and the expanse, and therefore cost, of site work would be nearly the same as the plans in the application, this concept is considered financially not feasible without direct wetland/watercourse disturbance.

11. Please explain the use of the State of Connecticut's E&S, and Stormwater manuals. The **2002 Connecticut Guidelines for Soil Erosion and Sediment Control** published by the Connecticut Department of Environmental Protection "are intended to provide information to government agencies and the public on soil erosion and sediment control. The Guidelines are a useful reference for projects that require erosion and sediment control planning design and implementation." Although published 19 years ago, these guidelines are the most recent and are still referenced on the Department of Energy and Environmental Protection website.

The **2004 Connecticut Stormwater Quality Manual** was published by The Connecticut Department of Environmental Protection "to provide guidance on the measures necessary to protect the waters of the State of Connecticut from the adverse impacts of post-construction stormwater runoff." Although published 17 years ago, these guidelines are the most recent and are still referenced on the Department of Energy and Environmental Protection website.

Both sets of guidelines were utilized in the development of the plans for this project.

Please contact us with any questions.

Sincerely,
DESIGN PROFESSIONALS, INC.



Daniel H. Jameson, PE
Project Manager