Rei'd 4-20-22

Thank you, Commissioners for volunteering to protect our town's irreplaceable natural resource.

Property owners have a right to develop, but they do not have a right to alter, destroy, or replace one square inch of wetlands without this commission's consent. A fundamental tenant of conservation is maintaining natural wetlands is preferable to their destruction and replacement by man-made wetlands. This is only deemed acceptable when a development's benefit outweighs this inherent environmental loss. A principal function of this commission is to assess that balance: the harm of replacing natural with constructed wetlands...vs...the benefit of development.

Due to the collective effect of South Windsor's millions of square feet of warehousing and related diesel trucking, elected town officials unanimously passed a moratorium, barring applications for this type of development. This position establishes that currently this type of project, not only lacks a net benefit or economic need to the town, but in fact is overwhelmingly harmful. Evaluating the relative need and benefit of a development is within the scope of this commission as the CT D.E.P. Wetland Reg Sec. 22a-39-6.1 states that a decision criteria of this commission must be "to balance the need for the economic growth ... with the need to protect its environment". Even the South Windsor IWWAC Reg Sec. 1.4 expressly requires this commission to protect the town's wetlands from "unnecessary" or "undesirable" uses. A development of this type, that is so detrimental it is now prohibited, can only be characterized as "not needed for economic growth", "unnecessary", and "undesirable". It is impossible for anyone say this project is "needed economically" as South Windsor already has a new distribution center on Ellington Rd, sitting empty.

The actions of other commissions can be taken into consideration in your determination of an application's relative benefit and economic need in just the same manner that drives many applicants to tout Economic Development Committee endorsements to this commission (which this application does not have BTW). This project does not justify destroying one square inch of wetlands, you have the authority to deny this, please do so.

That was my conceptual opposition to the development, I would love to provide a technical opposition, but a key piece of the application is absent, that being an accurate and coherent drainage report. Let me begin by reading the submitted "drainage report" posted on the IWACC website for this Sullivan Avenue-Kennedy Road application, I provided the first 4 pages (its actually page 2, page 2 page 3 and 4, as the applicant's report has two page 2s and no page 1):

Page 3..."Introduction

UW Vintage Lane II, LLC is proposing an industrial development of a tract of land comprised of four properties located at 5 & 25 Talbot Lane and 475 & 551
Governor's Highway, South Windsor, CT. The properties are referenced on the Town of South Windsor Tax Assessors map as GISH: 88900005, 88900025, 36900475 and 36900551, respectively. The proposed development will include the construction of one 359,640 SF industrial building. Associated site improvements will include but not be limited to new access driveways, parking areas for vehicles, sidewalks, landscaping, lighting, utilities, and stormwater management BMP's. The total combined tract area is 30.37 acres. 27.1+ acres of this area are proposed to be disturbed during construction. For more information, please refer to the plans entitled "25 Talbot Lane ~ Site Plan Application ~ 5 & 25 Talbot Lane and 475 & 551 Governor's Highway ~ South Windsor, Ct ~ GISH: 88900005, 88900025, 36900475 and 369005512 prepared by Design Professionals, Inc., and dated July 02, 2021, as amended."

Clearly the submitted report is an incorrect version. Whether it is a deliberate or unintentional conflation of two or more reports for other sites, it is incoherent and invalid. We as the public (and you) have the right to an accurate stormwater drainage report to conduct an assessment, and it is solely the responsibility of the applicant to provide it. You don't have to go much farther in the report to find more egregious errors:

The "Analysis of Results" section on page 4, beginning with "As seen in the Table above" appears to also be findings for a different location than the Sullivan Avenue-Kennedy Road site as the calculations do not conform to any of the findings on the table it refers, and it references the site draining into the Podunk River, miles south from this application's site.

This just scratches the surface, remember this is page 4, the report is 288 pages. Not that anyone would want to claim credit, but the report does not list the author, and has no stamp by an engineer to validate its findings. Clearly these gaffes signal what we already sensed; this application was rushed to be submitted before the moratorium, and accuracy suffered. Our irreplaceable natural resource should not bear the brunt of ineffective planning. This application should be denied as incomplete but at a minimum the public hearing should be held open and the applicant directed to immediately submit an accurate and intelligible stormwater drainage report reflecting **the correct site**, so the public can exercise their statutory right to inspect it and share their findings at a subsequent public hearing.

Thank you.

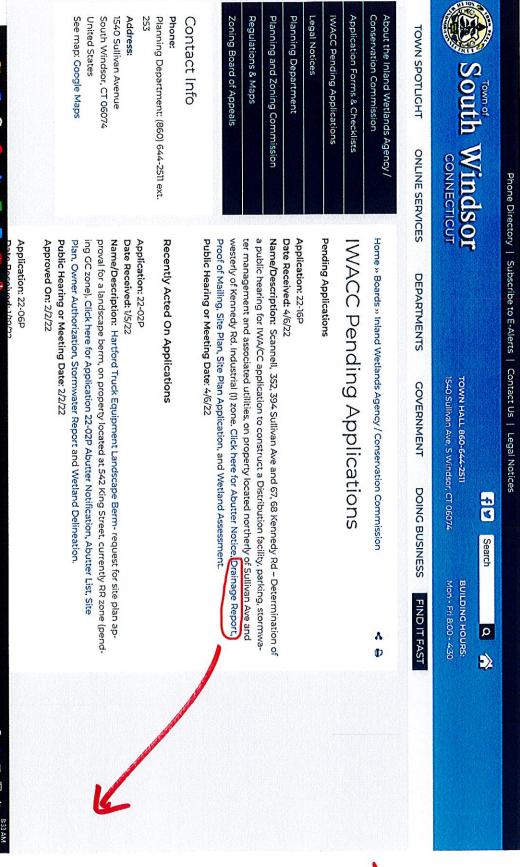


Table of Contents

Section	Page
Introduction	2
Pre-Development Site Conditions	2
Post-Development Site Conditions	3
Analysis of Results	4
Storm Sewer Analysis	5
Water Quality	5
Conclusion	5

Appendices

- Pre-Development Drainage HydroCAD Report
 Post-Development Drainage HydroCAD Report
 NRCS Soil Map & Data
 Drainage Area Maps
 Existing Condition Drainage Area Map
 Proposed Condition Drainage Area Map A В
- C
- D

Introduction

WRONG SITE

UW Vintage Lane II, LLC is proposing an industrial development of a tract of land comprised of four properties located at 5 & 25 Talbot Lane and 475 & 551 Governor's Highway, South Windsor, Connecticut. The properties are referenced on the Town of South Windsor Tax Assessors map as GIS#: 88900005, 88900025, 36900475 and 36900551, respectively. The proposed development will include the construction of one 359,640 SF industrial building. Associated site improvements will include but not be limited to new access driveways, parking areas for vehicles, sidewalks, landscaping, lighting, utilities, and stormwater management BMP's.

The total combined tract area is 30.37 acres. 27.1± acres of this area are proposed to be disturbed during construction. For more information, please refer to the plans entitled "25 Talbot Lane ~ Site Plan Application ~ 5 & 25 Talbot Lane and 475 & 551 Governor's Highway ~ South Windsor, Ct ~ GIS#: 88900005, 88900025, 36900475 and 36900551" prepared by Design Professionals, Inc., and dated July 02, 2021, as amended.

Pre-Development Site Conditions

The existing surficial characteristics of the area to be developed can be primarily classified as undisturbed woodland area surrounded by industrial development. The property shares its northern property boundary with Connecticut Southern Rail line. The center of this rail line was identified as the sites northern drainage limit. Further review of the site topography indicated a ridgeline exists spanning east to west across the center of the property. Stormwater that falls north of this boundary would flow to the rail line property. Stormwater that falls south of this boundary would flow to drainage system in Sullivan Ave and Kennedy Road. All stormwater runoff generated across the tract would flow to one of four design points. These four design points were identified as follows:

- 1. **Design Point 1 (DP#1):** Existing depression on Rail Line Property. Conveys water to a swale tributary to the Scantic River via an 18" CMP culvert.
- 2. **Design Point 2 (DP#2):** Sheet flow across the North-West Property corner to the Rail Line property.
- 3. **Design Point 3 (DP#3):** Sheet flow runoff to Sullivan Ave (via subsurface stormwater conveyance system on 330 Sullivan Ave in existing conditions).
- 4. Design Point 4 (DP#4): Sheet flow runoff to Kennedy Road.
- 5. Design Point 5 (DP#5): Existing roadway drainage to catchbasin in Kennedy Road.

All design points ultimately drain to The Scantic River, and is a part of local basin ID 4200-00-4-R18. Existing conditions watershed delineations are identified in the Existing Conditions Drainage Map located in **Appendix F**.

Based on Natural Resources Conservation Service (NRCS) Hydrologic Soil Group (HSG) mapping, soils types A, B, C, D, & B/D are located on site. See **Appendix C** for The NRCS Soil Map & Data.

An evaluation was performed to quantify the peak rate of stormwater discharge offsite to the design points identified. The Natural Resources Conservation Service's TR-55 Manual was followed in predicting the peak rates of runoff and volumes. HydroCAD computer modeling software was utilized.

Peak rates of stormwater runoff were evaluated for the 2-, 10-, 25-, 50- and 100-year storm events. For more information, please refer to the enclosed Pre-Development Drainage HydroCAD Report located in **Appendix A**.

Post-Development Site Conditions

The proposed development will include the construction of one 241,800 SF industrial building. Associated site improvements will include but not be limited to new access driveways, parking areas for vehicles, sidewalks, landscaping, lighting, utilities, and stormwater management BMP's. Site generated runoff from all proposed roofs, roadways, parking, and landscaped areas will be either collected in an underground storm water conveyance system or allowed to sheet flow to one of eight proposed detention systems. A general description of each detention system is included below:

- 1. Proposed Pond 1 (PP1): 101,025± cft underground storage system collecting runoff from the proposed roof area and detained flow from pond water quality basin PP2. Detained discharge from this pond will be released to a proposed preformed scour hole near the 18" Pipe outlet (DP1) adjacent to the Rail Road Property.
- 2. Proposed Pond 2 (PP2): 136,855± cft Water quality basin collecting runoff from the west truck parking and loading area. Detained discharge from this pond will be released pond underground chamber system PP1.
- 3. Proposed Pond 3 (PP3): 5,027± cft underground storage system collecting runoff from the grass areas south of the proposed berm along Sullivan Ave. Detained discharge from this pond will be released to an Existing CB in Sullivan Ave.
- 4. Proposed Pond 4 (PP4): 62,769± cft Water quality basin collecting runoff from the northern perimeter drive and detained flow from pond underground chamber system PP5. Detained discharge from this pond will be released to the proposed mitigation area within the existing railroad depression area.
- 5. Proposed Pond 5 (PP5): 5,682± cft underground storage system collecting runoff from the eastern standard parking areas. Detained discharge from this pond will be released to a splitter structure conveying detained flows to pond PP4 and a 6" outlet pipe proposed to send runoff directly to the mitigation area.

- 6. Proposed Pond 6 (PP6): 42,367± cft Water quality basin collecting runoff from the proposed cul-de-sac and existing Kennedy Road runoff. Detained runoff from this basin will be released to the existing stormwater collection system in Kennedy Road.
- 7. Proposed Pond 7 (PP7): 15,391± cft underground storage system collecting runoff from the grass area on the east side of the site adjacent to Kennedy Road. Detained runoff from this basin will be released to the existing stormwater collection system in Kennedy Road.
- 8. Proposed Pond 8 (PP7): 3,839± cft underground storage system collecting runoff from the grass areas south the proposed building and north of the proposed berm along Sullivan Ave. Detained discharge from this pond will be released to an Existing CB in Sullivan Ave.

See **Appendix B** for the Post Development Condition and Pond summary HydroCAD reports. The Proposed Conditions Drainage Map for the site can be found in **Appendix F**.

Analysis of Results

The pre-development and post-development conditions were analyzed using HydroCAD consistent with National Resource Conservation Service (NRCS) hydrology methods. Four discharge locations (**Design Point #1 - 4**) were identified as points of interest for assessing downstream effects. The following table contains the data generated from the HydroCAD software:

Reach		2 year	10 year	25 year	50 year	100 year
DP#1 – Rail Road Pond (North of site)	Pre	2.92	8.35	10.74	11.67	12.42
	Post	2.86	7.18	10.35	11.48	12.38
DP#2 – North West Corner of Site	Pre	0.02	0.29	0.68	1.05	1.52
	Post	0.02	0.15	0.28	0.38	0.51
DP#3 – Overland Flow to Sullivan Ave	Pre	0.00	0.74	1.77	2.73	3.90
	Post	0.00	0.33	1.27	2.14	3.07
DP#4 – Flow to Kennedy Road Drainage System	Pre	0.37	0.74	0.99	1.17	1.38
	Post	0.34	0.52	0.61	0.67	0.82

As seen in the table above, most of the storm events evaluated for the subject project will result in peak runoff rates in the proposed condition that are less than the peak runoff rates of the existing condition for 2-, 10-, 25-, 50- and 100-year design storms. There was a small 0.03 cfs increase in peak flow to DP#3 in the 2-yr storm. This increase to DP#3 is offset by reductions in the peak flow to DP#2 & 4, all of which ultimately drain to the Podunk River. It is our opinion that this increase is negligible and will not cause any detrimental downstream impacts.

WRONG SITE